



# CHAPTER 5 CONSULTATION AND COORDINATION

## INTRODUCTION

This chapter provides information on the public involvement activities and formal consultation that occurred during the preparation of the Dillon RMP and contains information on the public review process for the Draft RMP/EIS released in April 2004. It also contains the public comments received on the Draft RMP/EIS and BLM's responses to those comments.

The Proposed RMP/Final EIS was prepared by an interdisciplinary team of specialists, mostly from the Dillon Field Office, but with assistance from the Western Zone and Montana State Office. **Table 73** lists preparers, including substantial contributors to the plan who are no longer with the BLM Dillon Field Office.

Several steps of the planning process require that the public be provided the opportunity to participate. **Appendix B** contains a list of specific events convened as the RMP was developed. The Dillon planning process included several opportunities for the public to be involved in development of the plan beyond the standard planning and NEPA processes.

## SCOPING AND PUBLIC INVOLVEMENT PRIOR TO THE DRAFT RMP/EIS

A number of opportunities were available to the public to educate themselves about the planning process and participate in development of the plan prior to release of the Draft RMP/EIS for public review and comment.

### SCOPING

Scoping for the Draft RMP/EIS was initiated with publication of a Notice of Intent in the *Federal Register* on August 9, 2001. The formal scoping period concluded on October 18, 2001, though comments received after that date continued to be considered when possible. Besides identifying issues of concern, nominations for special management areas such as ACECs and Wild and Scenic Rivers were requested during scoping.

During this time, five public meetings were held in different locations within the planning area to explain the planning process and gather input. News releases to local and regional media sources advertised the times and locations of the scoping meetings. Just under 50 members of the public signed in at these meetings.

- Lima (5)
- Sheridan (9)
- Ennis (9)
- Dillon (18)
- Butte (5)

In addition, over 1200 scoping packets providing information about the planning process and inviting comments were mailed to agencies, organizations, and individuals.

## WILD AND SCENIC RIVER REPORT RELEASE

BLM released the Draft Wild and Scenic River Eligibility report in March 2002, requesting public comment on initial inventory recommendations. Notifications of availability of the report were published in local and regional newspapers, including the Dillon Tribune and the Montana Standard. Beaverhead County hosted a public hearing on March 25, 2002 as a cooperating agency in the plan to gather comments on the Draft Wild and Scenic Eligibility Report released as part of the planning process. Several presentations on the Wild and Scenic River process were also given by BLM at the request of several organizations before, during and after the comment period. Comments were reviewed and the Final Eligibility Report was revised and released in July 2002. The final report was sent to all contacts on the mailing list whether or not they were involved in the process.

## INFORMATION FAIR

BLM hosted an Information Fair in April 2002 to share GIS data and other information being used to compile the analysis of the management situation. This event was held at the BLM's Dillon Field Office over three days (April 9-11) between 1 p.m. and 8 p.m. News releases to local and regional media sources, including radio spots, advertised this event. All resource specialists working on the Dillon RMP were available during the Information Fair to explain base information, discuss issues, answer questions, and listen to public concerns. This event provided an opportunity to the public to see BLM data first-hand, identify concerns, and suggest additional data sources. Over 60 hard copy maps were available for view and expertise was available to the public over the three days to display and overlay automated digital coverages. A total of 17 people signed in as attendees at this event.

## FOCUS QUESTION WORKSHOPS

Nine workshops were hosted and facilitated in February 2003 by Beaverhead and Madison Counties and the Montana Consensus Council. BLM attended each of these sessions, but the purpose of these workshops was to hear from the public after providing earlier opportunities at the Scoping Meetings and Information Fair for the public to interact with BLM.

The purpose of the workshops was to gather information and directly involve the public in alternative development. Background information including discussions on current

conditions and management protocols was released in January 2003 to the entire RMP mailing list in a document called the “RMP Digest”. This document was produced to assist the public in understanding the issues and provide focused comment on relevant matters. Copies of the focus questions to be reviewed at the workshops were also provided. News releases to local and regional media sources, including radio spots, advertised this event to inform people not already on the mailing list. A “What’s On Your Mind” radio interview session by KDBM radio in Dillon was conducted in January 2003 prior to these workshops to explain the planning process and general local community interest in these workshops. Public attendance at the workshops is summarized below.

- Butte (9)
- Ennis (9)
- Lima (10)
- Twin Bridges (0)
- Harrison (14)
- Dillon (15)
- Jackson (2)
- Bozeman (28)
- Missoula (4)

Workshop responses were summarized in a report prepared by the Counties and submitted to BLM in March 2003. The Western Montana RAC reviewed this report in April 2003 and provided formal recommendations for BLM to include as the planning team developed a range of management alternatives. All of the workshop responses were considered by the team as the development of alternatives continued through the spring and summer of 2003.

## INTERVIEWS

Over 45 discussions regarding the potential social effects of the RMP were held with area and regional residents in the summer and fall of 2003. The participants included county commissioners, RAC members and others chosen to represent different geographic areas within the counties and different interests such as livestock permittees, motorized and nonmotorized recreationists, hunters, those interested in wood products, outfitters, etc. The discussions lasted from one to three hours and covered how the participants felt the proposed activities would affect them personally, and their attitudes toward the study area and the proposed activities. The results of these discussions are included in the social impacts sections.

## OTHER OUTREACH EFFORTS

A website was established for the RMP as well as a 1-800 number hotline for call-in comments and update information. Throughout the development of the Draft RMP/EIS, all individuals and organizations on the mailing list received copies of the *Dillon RMP Update* newsletter. This newsletter summarized where the BLM is in the process and how the public can become and stay involved in development of the plan. BLM also released an informational report in November 2002 documenting the relevance and importance

evaluations of the 63 ACEC nominations received as a result of scoping. This information was provided prior to release of the Draft RMP/EIS (where it is normally found) given the keen interest expressed in ACECs throughout this planning process.

## COLLABORATIVE EFFORTS

A variety of public involvement strategies have been implemented throughout this planning process to improve communication and develop understanding of the issues and the process in development of the RMP/EIS. As mentioned in Chapter 1, three issue-based working groups were formed by the Western Montana RAC to engage in collaborative problem-solving and consensus based decision-making to assist the BLM with recommendations on three issue areas: ACECs, Travel Management, and Wild and Scenic Rivers. Each of these groups were professionally facilitated by a representative from the Montana Consensus Council.

These working groups were convened under the provisions of the RAC charter as subgroups. These subgroups provided an avenue for a group of diverse interests to collaborate on recommendations that the full RAC could then review and forward to BLM as BLM’s official advisory group established under FLPMA. Membership in the subgroups reflected the three interest categories established by the RAC charter: Category 1 (Permit Holders, Commercial Operators on Public Lands), Category 2 (Environmental or Conservation Organizations, Dispersed Recreation, Archaeological/Historic Interests) and Category 3 (Elected Officials, State Employees, Tribal Officials, Public-At-Large).

Membership in each subgroup was determined by the RAC in coordination with BLM and the Montana Consensus Council. RAC members were requested to make contacts and provide names of individuals willing to work in a collaborative fashion and provide representation of their constituencies. Adjustments to the subgroups sometimes occurred after initial organization when subgroup members could not attend due to schedule conflicts or lack of time. Each subgroup established their ground rules of operation and decision-making processes at organizational meetings. Subgroup findings were presented to the official Western Montana RAC following subgroup work and recommendations. The official RAC then took those recommendations under advisement and made formal advisory recommendations to BLM for use in the plan.

## ACEC SUBGROUP

The RAC subgroup on ACECs consisted of six members, two representing each of the three interest categories established by the RAC charter. Kathy van Hook of the Montana



Consensus Council served as the facilitator for the group, and Mark Goeden acted as the BLM representative to answer questions and provide technical information. The subgroup included the following representatives:

- Sue Marxer (Category 1)
- Jim Hagenbarth (Category 1)
- Ben Deeble (Category 2)
- Jack Kirkley (Category 2)
- Mel Montgomery (Category 3)
- Ted Coffman (Category 3)

This group met between March and May 2002 and presented their findings to the Western Montana RAC at the June 10, 2002 meeting in Butte. The Western Montana RAC made final recommendations to the BLM at the same June 10, 2002 meeting.

The subgroup was able to come to consensus agreement on 38 of the 63 ACEC nominations (recommending that seven of the 38 go forward as potential ACECs). Members of the subgroup either could not agree on or did not review the remaining 25 nominations (mostly because they did not think they could reach agreement). The RAC recommendations were reviewed by BLM management and adopted by the BLM with minor adjustments. The planning team conducted the review on the remaining nominations, which resulted in a total of 13 potential ACECs considered in this document. See the BLM's report on *Relevance and Importance Evaluations of Areas of Critical Environmental Concern Nominations* (USDI-BLM 2002c) and the ACEC sections in this document for more details on the process, subgroup operation, and specific ACEC information.

## TRAVEL MANAGEMENT SUBGROUP

The RAC subgroup on Travel Management consisted of nine members, three representing each of the three interest categories established by the RAC charter. Gerald Mueller of the Montana Consensus Council served as the facilitator for the group, and Rick Waldrup acted as the BLM representative to answer questions and provide technical information. The subgroup included the following representatives:

- Doug Abelin (Category 1)
- Gene Loder (Category 1)
- Ellis Thompson (Category 1)
- Dick Young (Category 2)
- Dan Pence (Category 2)
- Tom Hough (Category 2—Alternate for Dan Pence)
- Scott McKee (Category 2)
- Robert Thomas (Category 2—Alternate for Scott McKee)
- Mark Anderson (Category 3)
- Bill Kolar (Category 3)
- Ted Harrison (Category 3)

This subgroup met between March and September 2002, and presented their findings to the Western Montana RAC at the September 5, 2002 meeting in Dillon. The Western Montana RAC made final recommendations to the BLM at the same September 5, 2002 meeting.

The Travel Management subgroup recommendations consisted of a set of maps identifying routes designated for motorized travel and a set of principles used as the guide for determining those routes. The RAC direction to the BLM was to incorporate this information into the preferred alternative of the Draft RMP/EIS as the “starting point”, with agreement that specific adjustments could be made if necessary in consideration of resource issues and other agency concerns. The BLM held to this request and made only limited adjustments, mostly in regard to access to adjacent Federal and State lands based on coordination with the Forest Service and other agencies. Subsequent adjustments have been made to develop the Proposed Action (Alternative B) in the Proposed RMP/Final EIS. These adjustments have been made as a result of extensive public comment on the travel management portion of this plan, but always in consideration of the principles established by the subgroup and approved by the RAC (see **Appendix I**).

## WILD AND SCENIC RIVER SUBGROUP

The RAC subgroup on Wild and Scenic Rivers consisted of nine members, three representing each of the three interest categories established by the RAC charter. Kathy van Hook of the Montana Consensus Council served as the facilitator for the group, and Lynn Anderson acted as the BLM representative to answer questions and provide technical information. The subgroup included the following representatives:

- Rob McCulloch (Category 1)
- Ray Marxer (Category 1)
- Tom Rice (Category 1)
- Jennifer Dwyer (Category 2)
- Richard Gotshalk (Category 2)
- Bill Cain (Category 2)
- Robin Cunningham (Category 3)
- Senator Bill Tash (Category 3)
- Russ Kipp (Category 3)

This subgroup met in July and August of 2002 and presented their findings to the Western Montana RAC at the September 5, 2002 meeting in Dillon. The Western Montana RAC made final recommendations to the BLM at the same September 5, 2002 meeting.

The Western Montana RAC subgroup reviewed all eight eligible river segments against the suitability criteria. They recommended five as not suitable, but could not agree on



three of the eight river segments they reviewed. These three segments along the Madison River were discussed by the planning team as the “most appropriate” of any of the segments to be found suitable. However, it was also agreed that current management along one segment which courses through the Bear Trap Unit of the Lee Metcalf Wilderness is adequate to protect those values and additional designation could cause increasing use to an area already at limits of acceptable change. Thus, this segment was not recommended as suitable. Jurisdiction and ownership issues on the other two segments along the Madison River prevented those segments from being recommended as suitable in the preferred alternative.

## RELEASE OF THE DRAFT RMP/EIS

The Draft RMP/EIS was mailed to the public at the end of March 2004. The Notice of Availability was published in the *Federal Register* by the Environmental Protection Agency on April 9, 2004, beginning the official 90-day comment period. BLM published a concurrent Notice of Availability at the same time containing supplemental information. Written comments on the Draft RMP/EIS were due July 12, 2004.

In addition to printed copies or CDs mailed to those people who requested them, the Draft RMP/EIS was available for review on the Dillon RMP website. Approximately 400 printed copies and 120 CDs were distributed.

Five open houses were held in and around the planning area in May 2004, hosted by BLM and Beaverhead and Madison Counties. The dates and locations of the open houses were distributed to the over 600 people on the mailing list via an *Update* newsletter. Press releases in local and regional newspapers and radio spots supplemented the mailing, and the dates were advertised on the Dillon RMP website.

These open houses were geared to provide information to the public on the content of the Draft RMP/EIS as well as to provide guidance on commenting on the document and answer questions. Each open house session began with an introductory Power Point presentation with an overview of the planning process and a comparison of major elements contained in the alternatives. Attendees were then encouraged to visit with BLM representatives and managers regarding questions or concerns about the Draft RMP/EIS.

### ***Open House Locations, Dates and Attendance***

Lima, Montana	May 3, 2004	5 attendees
Virginia City, Montana	May 4, 2004	3 attendees
Bozeman, Montana	May 6, 2004	9 attendees
Dillon, Montana	May 11, 2004	8 attendees
Butte, Montana	May 12, 2004	8 attendees

After the open houses were completed, two comment meetings were convened later in May 2004 for those wishing to make oral statements regarding the Draft RMP/EIS. This opportunity was provided as a result of recommendations made during public participation assessments conducted as part of the Dillon planning effort. These meetings were formally moderated and official transcripts documented all of the oral comment. The dates and locations of the Comment Meetings were also announced via the *Update* newsletter in local and regional media, and on the Dillon RMP website.

### ***Comment Meeting Locations, Dates and Attendance***

Ennis, Montana	May 18, 2004	7 attendees, 4 commenters
Dillon, Montana	May 25, 2004	9 attendees, 4 commenters

## FORMAL CONSULTATION

### FISH AND WILDLIFE SERVICE CONSULTATION

Federal agencies are required to comply with provisions of the Endangered Species Act of 1973, as amended (ESA). This includes a requirement to “consult” with the US Fish and Wildlife Service on any action that may affect species listed as threatened and endangered or result in destruction or adverse modification of habitat designated as critical for listed species. In addition, federal agencies must “confer” with FWS on any action that is likely to jeopardize the continued existence of any species proposed to be listed or any action that may result in the destruction or adverse modification of critical habitat proposed to be designated for listed species.

Contacts were made with the US Fish and Wildlife Service early on in the RMP process, and early drafts of alternative provisions were provided to staff for discussion. An initial list of federally listed threatened or endangered plant, animal, or fish species or habitats present in the Dillon Field Office planning area was requested on October 15, 2001, with an update received on January 28, 2004. Four federally listed threatened wildlife species and one threatened plant species potentially occur, or potential habitat is available in the planning area. These include grizzly bear (*Ursus arctos horribilis*), gray wolf (*Canis lupus*), Canada lynx (*Lynx canadensis*), bald eagle (*Haliaeetus leucocephalus*), and Ute Ladies’ Tresses (*Spiranthes diluvialis*).

An informal meeting was held with FWS biologists in October 2003 to discuss alternatives and consultation procedures to proceed with the release of the Draft RMP/EIS. BLM submitted its request to initiate formal Section 7 consultation with an accompanying Biological Assessment to the FWS on March 22, 2004, evaluating the impacts of the

Draft RMP/EIS Preferred Alternative (Alternative B) on federal threatened and endangered species. The US Fish and Wildlife Service issued a Biological Opinion to BLM on October 29, 2004, documenting its findings based on BLM's determinations outlined in the March 2004 biological assessment. Based on the provisions identified in Alternative B of the Draft RMP/EIS, the plan may affect, but is not likely to adversely affect, the bald eagle, Canada lynx, and Ute ladies' tresses. The proposed plan is not likely to jeopardize the gray wolf, a non-essential/experimental population within the planning area. BLM was provided a level of incidental take for grizzly bear (two bears over the life of the plan) as a result of concern over road densities and use conflicts with bears. However, the level of anticipated take is not likely to result in jeopardy to the species. FWS identified "Terms and Conditions" with which BLM will comply as long as the grizzly bear is a listed species.

The full text of the Biological Opinion can be found in **Appendix R** of the Proposed Plan/Final EIS.

## STATE HISTORIC PRESERVATION OFFICE CONSULTATION

The BLM cultural resource management program operates in accordance with 36 CFR Part 800 which provides specific procedures for consultation between the BLM and the State Historic Preservation Office. The SHPO was consulted during the development of the Draft RMP/EIS concerning cultural resources that may be affected. A coordination meeting was held with SHPO staff in February 2002 in Helena, Montana, and again in June 2004 to discuss provisions of the Draft RMP/EIS and address any questions. Formal comments were submitted by the SHPO on the Draft RMP/EIS on June 28, 2004. These comments have been addressed in the comment and response section of this chapter.

## TRIBAL CONSULTATION

In accordance with the National Historic Preservation Act as well as in recognition of the government-to-government relationship between tribes and the federal government, letters were sent to four (4) tribal governments and officials in August 2001 at the start of the Dillon planning process to inform them of the up coming Dillon RMP/EIS. The letters also requested their input on issues and concerns to be considered during the planning process and initiated efforts to identify areas of traditional cultural concern. Meetings were held with representatives of the Shoshone-Bannock Tribes in Fort Hall, Idaho and with the Confederated Salish and Kootenai Tribes in Pablo, Montana in February 2002 as work on the plan continued. Informal coordination occurred between BLM staff and Tribal representatives in the historic preservation divisions as the plan was prepared. Formal consultation meetings on the Draft RMP/EIS were held with Tribal representatives and BLM managers and staff in Pablo,

Montana on April 23, 2004 and in Fort Hall, Idaho on May 10, 2004. Neither the Shoshone-Bannock Tribes or the Confederated Salish and Kootenai Tribes provided formal comments on the Draft RMP/EIS.

## PUBLIC COMMENTS ON THE DRAFT RMP/EIS

One thousand, six hundred and sixty-nine (1,669) comment submissions on the Draft RMP/EIS were received by the close of the comment period on July 12, 2004. Submissions included 121 letters, 98 comment sheets, eight transcripts from oral comment proceedings, eight postcards, and four faxes, with the remainder transmitted via electronic mail. Of these submissions, 134 (8%) came from addresses within the planning area, and 316 (19%) came from addresses within Montana. The following list outlines submissions by state:

Alaska	1	North Carolina	15
Alabama	2	Nebraska	2
Arkansas	2	New Hampshire	6
Arizona	184	New Jersey	19
California	121	New Mexico	89
Colorado	298	Nevada	62
Connecticut	16	New York	43
Florida	47	North Dakota	1
Georgia	13	Ohio	15
Hawaii	2	Oklahoma	7
Iowa	8	Oregon	18
Idaho	44	Pennsylvania	31
Illinois	28	Rhode Island	5
Indiana	3	South Carolina	4
Kansas	7	Tennessee	11
Kentucky	6	Texas	26
Louisiana	3	Utah	59
Massachusetts	12	Virginia	10
Maryland	10	Vermont	5
Maine	4	Washington	33
Michigan	14	Washington D.C.	1
Minnesota	12	West Virginia	4
Missouri	6	Wisconsin	13
Mississippi	1	Wyoming	30
Montana	316		

One submission came from an overseas address for the Armed Forces in the Pacific.

An additional 39 submissions were received after the closing date but prior to October 1, 2004, with most received in the week following the close of the comment period. None of the late submissions raised substantially new issues or concerns not already addressed by comments received by the deadline. Names of the individuals or organizations/entities providing comments after the deadline up until October 1, 2004 have been included in this document.

## HOW THE COMMENTS WERE HANDLED

The *Comment and Response* section presented below was developed through a content analysis. Actual comment submissions (letters, emails, etc.) have not been reprinted. During the comment review, similar concerns were grouped and have been addressed with one response. In some instances, the original language has been retained and in others the comment has been summarized, especially when several commenters expressed the same concerns. For example, most of the electronic mail comments appeared to be sent as a result of alerts issued by the Greater Yellowstone Coalition and The Wilderness Society, containing identical “campaign-style” language and recommendations. Comments similar to each other have been combined and summarized and are responded to once in the *Comment and Response* section. Commenters can reference their name (listed alphabetically by last name, or by the name of the organization or government entity represented) to identify the sections that contain responses to their identified concerns. **Commenters should note that when several submissions identified the same concern, the concern was summarized and may not appear with wording identical to the commenters language.**

Upon receipt, each submission was assigned an identification number and logged into a tracking database. Comments from each submission were also entered into a database and coded to appropriate categories based on content of the comment, retaining the link to the commenter. Duplicate comments from “campaign-style” submissions were only entered once, but responses to these comments have been cross-referenced to each commenter’s name. The categories generally follow the sections presented in the Draft RMP/EIS, though some relate to planning processes or editorial concerns. Comments were then distributed to resource specialists and BLM managers for review and consideration. Some comments warranted additional team discussion; others could be addressed by specialist or management review only.

All comments were reviewed and considered, however comments were not counted as “votes”. Comments that presented new data or addressed the adequacy of the document, the alternatives, or the analysis are responded to in the Proposed RMP/Final EIS. Changes were made to the Preferred Alternative (Alternative B) presented in the Draft RMP/EIS as a result of comments. Major changes or additions in the Proposed Plan/Final EIS are shaded in light gray, and reflect consideration given to public comment, corrections and rewording for clarification. A list of major changes to the document can be found in Chapter 1 of the Proposed RMP/Final EIS.

Many comments received throughout the process expressed personal opinions or preferences, had little relevance to the

adequacy or accuracy of the Draft RMP/EIS, or represented commentary regarding resource management without any real connection to the document being reviewed. These comments did not provide specific information to assist the planning team in making a change to the Preferred Alternative, did not suggest other alternatives, and did not take issue with methods used in the Draft RMP/EIS, and are not addressed further in this document. Examples of some of these comments include:

- *The best of the alternatives is Alternative C.*
- *Alternative A is the preferred alternative for residents of Beaverhead County.*
- *The BLM has yet to show land stewardship at or above the level currently demonstrated by the private sector.*
- *Alternative B is very well done. Some of its proposals should be modified as in Alternative C to reduce impacts.*
- *I want the EIS to reflect the following for this area: no hunting, no trapping, no grazing, no logging, no drilling, no mining, and no ATVs, snowmobiles or jet skis.*
- *Our greatest asset is southwest Montana is wild country that we can escape to.*
- *BLM past sage treatment projects have been detrimental to the welfare of sage grouse and other species in southwest Montana, including Big Sheep and Nicholia Creek.*
- *Protect the spectacular lands that the BLM manages in southwest Montana. These lands are critical wildlife corridors if we are to keep the greater Yellowstone area from becoming an island unto its own.*
- *The Dillon plan needs to help stop the spread of noxious weeds and exotic plants by addressing off road vehicles, livestock, logging, and fire.*
- *Do not add any more road closures to what is now in existence! It seems to be working fairly well and folks are familiar with the closures.*
- *Working ranches are more effective than other conservation tools in protecting a wide range of resources.*
- *I support others rights to access BLM lands, for any legal, legitimate purpose whatsoever and I support securing public right-of-ways across private lands to access BLM lands for any legal, legitimate purpose whatsoever.*
- *We are pleased to see a goal to provide opportunities for development of renewable energy resources (wind, solar, biomass, low impact hydropower, etc., page 118).*



- *Please designate the following as Areas of Critical Environmental Concern under all alternatives: the Sagebrush Creek, Big Sheep Creek Basin and Black-tail Wildlife Linkage nominations; and Beaverhead Rock, Block Mountain, Blue Lake, Centennial Mountains, Centennial Sandhills, Centennial Valley Wetlands, Everson Creek, the Lewis and Clark Trail, Muddy Creek, Virginia City Historic District, Westslope Cutthroat Trout Habitats and the Ferruginous Hawk Nesting Area.*
- *If cutting timber in any prescription will help give us greater snowshoe hare numbers (the main prey of lynx) I will do as instructed, but I think the greatest obstacle facing the lynx is the seven years of drought we have been in.*
- *It is very important to conserve species driven close to extinction in the USA as the grizzly bear, lynx, and gray wolf. Please do not allow false reputations of wolves and other misunderstood animals to be propagated because the wolf's virtual elimination from the US and scarcity elsewhere is due to this.*
- *The vast majority of hunters rely on muscle power to hunt and retrieve game. In 2001, 96 percent of over 3,200 hunters in Fish, Wildlife and Parks Region 3 did not use off-road vehicles.*

Some comments addressed issues that will not be decided in the Dillon land use planning process, either because the decisions are not made at this level, or because BLM has no jurisdiction over the issue being discussed. See the section titled *Outside the Scope* for responses to these comments.

## COMMENT CATEGORIES AND COMMENTER NAMES

Two lists are provided on the following pages. The first list is an index of codes assigned to the 29 subject categories receiving comments. The second list alphabetically lists the agencies, organizations, and persons who submitted comments on the Draft RMP/EIS, and the codes associated with their comments and concerns. Commenters can find their name (or the name of the agency or organization they represented when submitting comments) and the corresponding comment codes and look up responses to see how their concerns have been addressed.

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## List of Commenters/Codes

The following list displays the names of the individuals, organizations, and/or government entities who commented on the Draft RMP/EIS and the corresponding comment codes (shown after the name). Organizations and government entities are listed by the organization or government agency rather than by the signatory to the submission. Commenters can use this cross-reference to review responses to their comments by referencing the appropriate comment sections.

<i>Name</i>	<i>Comment #</i>
Abern, Leslee	B5, C24, I29, P6, CC14
Adam, Margaret	B5, C24, I29, P6, CC14
Adams, Evelyn	B5, C24, I29, P6, CC14
Adams, Gary	C26, C35, T78, AA15, CC1, CC4
Adams, George	B5, C24, I29, P6, CC14
Adams, Lani	C26, C35, T78, AA15, CC1, CC4
Adams, Roger	B5, C24, I29, P6, CC14
Adler, Connie	B5, C24, I29, P6, CC14
Adler, Philip	T5, T8, T10, CC1
Adolay, Peter	B5, C24, I29, P6, CC14
Aengst, Peter	T8, CC1, CC16
Ahlstrom, Jennifer	B5, C24, I29, P6, CC14
Aho, Ken	C26, C35, T78, AA15, CC1, CC4
Albers, Carla	B5, C24, I29, P6, CC14
Albert, Annette	B5, C24, I29, P6, CC14
Alcorn, Margaret	B5, C24, I29, P6, CC14
Alder Gulch Ski Alliance	T1, T10, V52
Alderson, George and Frances	T66, CC1, CC3, CC10
Alexander, Leslee	B5, C24, I29, P6, CC14
Alexander, Michal	B5, C24, I29, P6, CC14
Alfred, Lynda	B5, C24, I29, P6, CC14
Allen, Angela	B5, C24, I29, P6, CC14
Allen, Marcia	B5, C24, I29, P6, CC14
Allen, Sheryl	B5, C24, I29, P6, CC14
Alliance for the Wild Rockies	B5, C24, I29, P6, CC14
Allred, Frances	B5, C24, I29, P6, CC14
Althaus, Priscilla	B5, C24, I29, P6, CC14
American Wildlands	C1, C2, C3, C11, C15, C16, D1, I4, I14, I15, I16, I17, I18,

<i>Name</i>	<i>Comment #</i>
	I19, I20, I21, J5, J24, J25, J28, J30, M20, N12, N19, P15, T9, T60, T62, T63, T64, U2, U7, V46, V90, V92, V93, V94, V95, Z1, Z5, AA15, AA16, AA17, AA31, AA52, AA53, AA60, BB2, CC4, CC5, CC6, CC11, CC15
Amuso, Mary Ellen	B5, C24, I29, P6, CC14
Andelin, Clark	C26, C35, T78, AA15, CC1, CC4
Anderson, Chad	B5, C24, I29, P6, CC14
Anderson, David	B5, C24, I29, P6, CC14
Anderson, Jon	B5, C24, I29, P6, CC14
Anderson, Judith	B5, C24, I29, P6, CC14
Anderson, Michael	B5, C24, I29, P6, CC14
Anderson, Ryan	B5, C24, I29, P6, CC14
Anderson, Thomas	L2, Q5, T10
Andrews, Ernest	B5, C24, I29, P6, CC14
Andrews, Jenna	B5, C24, I29, P6, CC14
Anna, Dee	B5, C24, I29, P6, CC14
Anthony, Robert	T78, CC1, CC4
Antillon, Rick	B5, C24, I29, P6, CC14
Archambault, Jesse	B5, C24, I29, P6, CC14
Archambault, Nicholas	B5, C24, I29, P6, CC14
Archambault, Ric	B5, C24, I29, P6, CC14
Argabright, Carol	B5, C24, I29, P6, CC14
Arp-Adams, Heidi	B5, C24, I29, P6, CC14
Artley, Dick	B5, C24, I29, P6, CC14
Ash Grove Cement	T10
Ashment, Seanna	B5, C24, I29, P6, CC14
Asseff, Sam	B5, C24, I29, P6, CC14
Atkinson, Dean	B5, C24, I29, P6, CC14
Atwater, Beage	C26, C35, T78, AA15, CC1, CC4
Atwood, Laura	C26, C35, T78, AA15, CC1, CC4
August, Patricia	C26, C35, T78, AA15, CC1, CC4
Austein, Beth Anne	T10, T66, T67, V95, CC3, CC4
Babiak, Katherine	B5, C24, I29, P6, CC14
Bacidore, Tracey	B5, C24, I29, P6, CC14
Bafik-Vehslage, Michelle	B5, C24, I29, P6, CC14
Bailey, Joan	R10, T10, CC1

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Bain, Nancy	C26, C35, T78, AA15, CC1, CC4	Beard, Maureen	B5, C24, I29, P6, CC14
Baiz, Claire, Thomas, Samantha, and Asa Michael	T8, CC1, CC4	Beattie, Sally	B5, C24, I29, P6, CC14
Baker, Deborah	B5, C24, I29, P6, CC14	Beauchamp, Cynthia	B5, C24, I29, P6, CC14
Ball, Betty and Gary	B5, C24, I29, P6, CC14	Beaudette, Janis	B5, C24, I29, P6, CC14
Ball, Daniel	C26, C35, T78, AA15, CC1, CC4	Beaudette, Robert	B5, C24, I29, P6, CC14
Balmer, Randall	C26, C35, T78, AA15, CC1, CC4	Beaverhead County Commissioners	E1, E2, E3, E4, F5, G4, G7, I22, I23, I24, K1, K2, K10, K12, K13, L9, N2, N7, N13, N23, N24, N29, N37, R4, R6, R12, R13, R16, R17, R18, S1, S2, S5, T11, T12, T30, T42, T43, T44, T45, T46, T47, T48, T74, T75, T76, T77, U13, W1, W2, W3, W6, X5, Z7, BB1
Bankert, Frani	Q8, T5, T8, T10, CC3, CC4	Beaverhead County Weed Control	L3, L7
Bannack Grazing Association	T65, V2	Beaverhead Outdoor Association	M19, T10, T51, T65, T74, V2, V9, V26, V29, V30, V31, V32, V33, V35, V34
Baptista, D.M.	B5, C24, I29, P6, CC14	Beaverhead Resource Use Plan (Robert Holt)	V67, V68, V69
Barbee, Scott	B5, C24, I29, P6, CC14	Beaverhead Sno Riders	T10, T30, V28
Barker, Christopher	B5, C24, I29, P6, CC14	Becker, Mike and Stephanie	Q8, T10, CC1, CC4
Barker, Helen	B5, C24, I29, P6, CC14	Beckner, Azel	B5, C24, I29, P6, CC14
Barlow, Rick	C26, C35, T78, AA15, CC1, CC4	Behrens, Joanna	B5, C24, I29, P6, CC14
Barrett, Debby	E5, N36, R3, R31, T65, AA30	Belden, Susan	B5, C24, I29, P6, CC14
Barron, Joshua	C26, C35, T78, AA15, CC1, CC4	Bell, Ann	B5, C24, I29, P6, CC14
Barrows, Michael	B5, C24, I29, P6, CC14	Benedict, Thom	B5, C24, I29, P6, CC14
Barry, Marina	B5, C24, I29, P6, CC14	Benjamin, Al	B5, C24, I29, P6, CC14
Barshay, Don	B5, C24, I29, P6, CC14	Bennett, Anna	B5, C24, I29, P6, CC14
Barton, Roberta	B5, C24, I29, P6, CC14	Bennett, Kirbie	B5, C24, I29, P6, CC14
Baseler, Samuel	B5, C24, I29, P6, CC14	Bennett, Michal	B5, C24, I29, P6, CC14
Baskin, Gregory	B5, C24, I29, P6, CC14	Bentley, Don and Linda	B5, C24, I29, P6, CC14
Bastian, Dave	B5, C24, I29, P6, CC14	Bentley, Sarah	C26, C35, T78, AA15, CC1, CC4
Batchler-Wilson, Tammy	B5, C24, I29, P6, CC14	Benton, Clayton	B5, C24, C26, C35, I29, P6, T78, AA15, CC1, CC4, CC14
Bateman, Richard E.	B5, C24, I29, P6, CC14	Berg, Hans	B5, C24, I29, P6, CC14
Bates, Margo	B5, C24, I29, P6, CC14	Berg, James M.	B5, C24, I29, P6, CC14
Bates, Scott	B5, C24, I29, P6, CC14	Bergeson Ranch (Bill Clarno)	T65, V2, V16
Batson, Virginia	B5, C24, I29, P6, CC14	Berman, Irwin and Lila	B5, C24, I29, P6, CC14
Bauer, Ernst	B5, C24, I29, P6, CC14	Berman, Lila	B5, C24, I29, P6, CC14
Bauer, Gwynneth	B5, C24, I29, P6, CC14		
Bauer, Priscilla	B5, C24, I29, P6, CC14		
Bauman, Rae	B5, C24, I29, P6, CC14		
Bayley, Robert and Shirley	T1, T10, T66		
Baylin, Frank	B5, C24, I29, P6, CC14		
Beal, Ginny	B5, C24, I29, P6, CC14		
Bear Creek Ranch	T65, V2, V44, V66		



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Bernet, Maurita	B5, C24, I29, P6, CC14
Berti, Chris	B5, C24, I29, P6, CC14
Bertoia, Celia	T5, T10, CC1
Bertram, Sharla	B5, C24, I29, P6, CC14
Bertsch, Greg	B5, C24, I29, P6, CC14
Bescript, Linda	B5, C24, I29, P6, CC14
Betz, Mark	B5, C24, I29, P6, CC14
Bevis, Bill	Q12, T10, T74
Bezette, Russell	B5, C24, I29, P6, CC14
Bhojwani, Roshan	B5, C24, I29, P6, CC14
Bickel, Bettina	B5, C24, C26, C35, I29, P6, T78, AA15, CC1, CC4, CC14
Big Sheep Creek Ranch (Tom Greenslade)	T65, V2, V15, V18, V19, V36
Bilello, Daniel	B5, C24, I29, P6, CC14
Bills, Garland D.	B5, C24, I29, P6, CC14
Bischke, Scott and Katie Gibson	T10, AA15
Biser, James	B5, C24, I29, P6, CC14
Bishop, Russ	B5, C24, I29, P6, CC14
Blackwell, Pat	C26, C35, T78, AA15, CC1, CC4
Blackwell, Robert	C26, C35, T78, AA15, CC1, CC4
Blackwell, Sama	B5, C24, I29, P6, CC14
Blain, Richard	C26, C35, T78, AA15, CC1, CC4
Blake, Jerry	B5, C24, I29, P6, CC14
Blakely, Carmen	B5, C24, I29, P6, CC14
Blakely, Stephen	B5, C24, I29, P6, CC14
Blashill, Tracy	CC4
Blaszczak, Joseph	B5, C24, I29, P6, CC14
Bloom, Claudia	B5, C24, I29, P6, CC14
Blume, Gerald	C26, C35, T78, AA15, CC1, CC4
Blumel, Jr., Herman F.	B5, C24, I29, P6, CC14
Bodda, Don	T45, T51
Boddie, Nathan	C26, C35, T78, AA15, CC1, CC4
Boehmke, John	B5, C24, I29, P6, CC14
Boelter, Jenny	B5, C24, I29, P6, CC14
Boelter, Jim	B5, C24, I29, P6, CC14
Bogardus, David	C26, C35, T78, AA15, CC1, CC4

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Bohlman, Clay	H6
Bolbol, Deniz	C26, C35, T78, AA15, CC1, CC4
Boldt, Todd	C26, C35, T78, AA15, CC1, CC4
Bolin, Amy	B5, C24, I29, P6, CC14
Bolin, Mike	V85
Bolle, Frank	B5, C24, I29, P6, CC14
Bonk, Marliese	B5, C24, I29, P6, CC14
Bonnell, Ann	B5, C24, I29, P6, CC14
Bonner, V. John	B5, C24, I29, P6, CC14
Border, Timothy	B5, C24, C26, C35, I29, P6, T78, AA15, CC1, CC4, CC14
Bostock, V.	B5, C24, I29, P6, CC14
Bottner, Rob	B5, C24, I29, P6, CC14
Bottomly, Lewis	B5, C24, I29, P6, CC14
Bowman, Carla	T10
Boyd, Jesse	B5, C24, I29, P6, CC14
Bradley, Karen	B5, C24, I29, P6, CC14
Brame, Joe	B5, C24, I29, P6, CC14
Brebner, Robert	C26, C35, T78, AA15, CC1, CC4
Bredbenner, Jay	B5, C24, I29, P6, CC14
Breeding, Noreen	T10, T21, T68, CC1
Breen, Bob	B5, C24, I29, P6, CC14
Bremer, Fred	C26, C35, T78, AA15, CC1, CC4
Brewer, Jeannine	C26, C35, T78, AA15, CC1, CC4
Briggs, Janet	B5, C24, I29, P6, CC14
Briggs, Robert	Q13, V2, V27
Brightwell, Lawrence	B5, C24, I29, P6, CC14
Brill, J. Marty	No comment to address.
Brinkerhoff, Jeremy	B5, C24, I29, P6, CC14
Brinkmeyer, Tom	B5, C24, I29, P6, CC14
Briscoe, Laverne	B5, C24, I29, P6, CC14
Brister, Bob	AA15, CC1, CC4, CC6
Britton, Diane	C26, C35, T78, AA15, CC1, CC4
Brock, Ron	B5, C24, I29, P6, CC14
Brodhead, Kathy	B5, C24, I29, P6, CC14
Bronson, Jonette	B5, C24, I29, P6, CC14
Brothers, Jeremy	B5, C24, I29, P6, CC14
Brown, Bert	T65, V2, V5, V75

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Brown, Carle	C26, C35, T78, AA15, CC1, CC4	Campbell, Candy	B5, C24, I29, P6, CC14
Brown, Eugene	T10, T45, V4, V5, V11, V76, V77, Y4	Canty, Ted	C26, C35, T78, AA15, CC1, CC4
Brown, Lauren	B5, C24, I29, P6, CC14	Capital Trail Vehicle Association	G8, H3, J36, L2, M3, M5, M6, M10, R9, R10, R21, R23, R27, T10, T16, T17, T18, T22, T25, T28, T29, T30, T33, T35, T45, T47, T48, T51, T55, T56, T57, T58, T59, T65, T69, T72, T74, T75, T79, V90, W4, W5, Y9, AA37
Brown, Patrick	B5, C24, I29, P6, CC14	Carey, Michele	T8, T66, CC1, CC4
Brown, Phyllis	B5, C24, I29, P6, CC14	Carmichel, Janet	B5, C24, I29, P6, CC14
Brown, Rose	B5, C24, I29, P6, CC14	Carney, Trish	C26, C35, T78, AA15, CC1, CC4
Brown, Steve	T10, V5	Carr, Donna and Ken	C26, C35, T78, AA15, CC1, CC4
Brown, Viveka	B5, C24, I29, P6, CC14	Carsella, Jim	B5, C24, I29, P6, CC14
Brownfield, Harry	C26, C35, T78, AA15, CC1, CC4	Carte, Mike	C26, C35, T78, AA15, CC1, CC4
Brunkhorst, Paul	T10	Carter, Alyssa	B5, C24, I29, P6, CC14
Brush, Deborah	B5, C24, I29, P6, CC14	Carter, Jeff	B5, C24, I29, P6, CC14
Bruzzese, Lynne	B5, C24, I29, P6, CC14	Case, Dawn	C26, C35, T78, AA15, CC1, CC4
Bujok, Gary	T10	Casper, Richard	B5, C24, I29, P6, CC14
Bunch, Christopher	B5, C24, I29, P6, CC14	Cassidy, Virginia	C26, C35, T78, AA15, CC1, CC4
Buono, Alfred	C26, C35, T78, AA15, CC1, CC4	Casteel, Kristine	B5, C24, I29, P6, CC14
Bureau of Reclamation	D3, F5, T14, Z11, Z16	Cavallo, Sharon	C26, C35, T78, AA15, CC1, CC4
Burke, William	B5, C24, I29, P6, CC14	Ceaser, Phyllis	C26, C35, T78, AA15, CC1, CC4
Burkhart, David	C26, C35, T78, AA15, CC1, CC4	Center for Biological Diversity	B5, C24, I29, P6, CC14
Burkhead, Laurie	B5, C24, I29, P6, CC14	Chalker, Mikki	C26, C35, T78, AA15, CC1, CC4
Burnett, Sheri	B5, C24, I29, P6, CC14	Chamber of Commerce	T10, V17, V75, V78, V89
Burns, Carolyn	B5, C24, I29, P6, CC14	Chamblin, Kary	B5, C24, I29, P6, CC14
Burns, Denise	B5, C24, I29, P6, CC14	Champagne, Jenette	C26, C35, T78, AA15, CC1, CC4
Burns, R. Michael	B5, C24, I29, P6, CC14	Chandler, Cheryl	B5, C24, I29, P6, CC14
Burris, Brett	C26, C35, T78, AA15, CC1, CC4	Chandler, George	B5, C24, I29, P6, CC14
Burt, Gordon	B5, C24, I29, P6, CC14	Chaney, Kathryn	B5, C24, I29, P6, CC14
Burt, Jenny	B5, C24, I29, P6, CC14	Chase, Lisa	B5, C24, I29, P6, CC14
Buss, William	B5, C24, I29, P6, CC14		
Busse, Barbara	B5, C24, I29, P6, CC14		
Calascibett, Patricia	C26, C35, T78, AA15, CC1, CC4		
Calbert, Anita	B5, C24, I29, P6, CC14		
Caldwell, Christopher	B5, C24, I29, P6, CC14		
Califf, Stanley	C26, C35, T78, AA15, CC1, CC4		
Callier, Laura	B5, C24, I29, P6, CC14		
Cameron-Martin, Jeffrey and Clair	C26, C35, T78, AA15, CC1, CC4		

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Cheney, Roberta	G2, J35, L2, L7, T10, T21, T37, T66, T67, CC4, CC13, CC15
Cheney, Scott	B5, C24, I29, P6, CC14
Chernushin, Mary	B5, C24, I29, P6, CC14
Cherry, Bob	E6, T74, V12, V13, V21, V60, V65, V91
Chevalier, Maurice and Betty	B5, C24, I29, P6, CC14
Chipman, Pamela	B5, C24, I29, P6, CC14
Choate, Charmian	B5, C24, I29, P6, CC14
Christian, B. Jane	B5, C24, I29, P6, CC14
Christopher, John	T10, CC1, CC4
Clark, Carl	C26, C35, T78, AA15, CC1, CC4
Clark, Jan	B5, C24, C26, C35, I29, P6, T78, AA15, CC1, CC4, CC14
Clark, Nanette	C26, C35, T78, AA15, CC1, CC4
Clark, Susan	B5, C24, I29, P6, CC14
Clay, Margaret	B5, C24, I29, P6, CC14
Cleary, James	C26, C35, T78, AA15, CC1, CC4
Clepper, Lorraine	B5, C24, I29, P6, CC14
Clinton, Jack	B5, C24, I29, P6, CC14
Clucas, Kenneth	B5, C24, I29, P6, CC14
Coakley, Carrie	B5, C24, I29, P6, CC14
Coburn, Pamela	B5, C24, I29, P6, CC14
Cochran, Amalia	B5, C24, I29, P6, CC14
Cockerill, Joanne	B5, C24, I29, P6, CC14
Cohen-Stratynner, Barbara	T10, T21
Colavito, Dave	T5, T8, CC1, CC3, CC4
Colby, Paula	B5, C24, I29, P6, CC14
Cole, Barbara (BB)	B5, C24, I29, P6, CC14
Coleman, Connie	B5, C24, I29, P6, CC14
Coleman, Shaz	B5, C24, I29, P6, CC14
Colledge, Jeffrey	B5, C24, I29, P6, CC14
Colletti, Jean	B5, C24, I29, P6, CC14
Collins, Jeffrey	B5, C24, I29, P6, CC14
Collinson, Ellie	B5, C24, I29, P6, CC14
Colman, Laura	B5, C24, I29, P6, CC14
Colton, John	T65, V2, V5, V17, V27, V28, V31, V32, V33, V35, V45, V68, V73, V78, V83, V85, V88

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Comstock, Carolyn	B5, C24, I29, P6, CC14
Cone, Francis	C26, C35, T78, AA15, CC1, CC4
Conlon, Lindsay	B5, C24, I29, P6, CC14
Conn, Craig	C26, C35, T78, AA15, CC1, CC4
Conroy, Eileen	B5, C24, I29, P6, CC14
Cook, Carol	B5, C24, I29, P6, CC14
Cooke, D.	C26, C35, T78, AA15, CC1, CC4
Cooke, Marc	B5, C24, I29, P6, CC14
Coolidge, Joanna	B5, C24, I29, P6, CC14
Cooper, James	C26, C35, T78, AA15, CC1, CC4
Cooper, Susan	B5, C24, I29, P6, CC14
Corral, Susan	B5, C24, I29, P6, CC14
Cosgrove, Jennifer	B5, C24, I29, P6, CC14
Couillard, Patricia	B5, C24, I29, P6, CC14
Council, Paul	T10, CC1, CC4
Coventry, Joseph	B5, C24, I29, P6, CC14
Cover, Esther	B5, C24, I29, P6, CC14
Covington, Donna	B5, C24, I29, P6, CC14
Cox, Tammy	B5, C24, I29, P6, CC14
Craven, Newton	G5, T48, T51,
Crawford, Leroy	G5, Q15, T10, T31, T42, T51, V2
Crenshaw, Aisha	B5, C24, I29, P6, CC14
Crockett, Stephen	B5, C24, I29, P6, CC14
Crowden, Michael	B5, C24, I29, P6, CC14
Crowden, Pam	B5, C24, I29, P6, CC14
Crowley, Lawrence	B5, C24, I29, P6, CC14
Cucchi, Jessica	B5, C24, I29, P6, CC14
Curnow, Connie	B5, C24, I29, P6, CC14
Curotto, John	B5, C24, I29, P6, CC14
Curran, Edmund and Ann	T10, CC3
Curren, Donelda	B5, C24, I29, P6, CC14
Curtin, Robert	B5, C24, I29, P6, CC14
Curtis, Alice	B5, C24, I29, P6, CC14
Cuthbertson, Timothy	C26, C35, T78, AA15, CC1, CC4
Cvetkovich, Judy	B5, C24, I29, P6, CC14
Dallam, Beth	B5, C24, I29, P6, CC14
Dalton, Gerald	C26, C35, T78, AA15, CC1, CC4



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Daluz, Ze	B5, C24, I29, P6, CC14	Docraat, Yacob	C26, C35, T78, AA15, CC1, CC4
Dangel, Emily	B5, C24, I29, P6, CC14	Dodson, Sandie	C26, C35, T78, AA15, CC1, CC4
Daniels, J. Scott	B5, C24, I29, P6, CC14	Dolbee, Scott	B5, C24, I29, P6, CC14
Dantes, Myrna	C26, C35, T78, AA15, CC1, CC4	Donovan, Benjamin	B5, C24, I29, P6, CC14
Darby, Sarah	B5, C24, I29, P6, CC14	Doray, Paul	B5, C24, I29, P6, CC14
Davidson, Jim	CC1, CC14	Double Eagle Petroleum Company	G6, P7, P10, P16, P17, P18, Q9, R7, CC18
Davis, George	B5, C24, I29, P6, CC14	Douglas, Sarah	B5, C24, I29, P6, CC14
Davis, Kris	B5, C24, I29, P6, CC14	Douglass, Terri	B5, C24, I29, P6, CC14
Davis, Vicky	C26, C35, T78, AA15, CC1, CC4	Dragging Y Cattle Company	I1, I2, N3, U5,
Davlanter, Nancy	T78, AA15, CC1, CC4	Drake, Mercy	B5, C24, I29, P6, CC14
De A' Morelli, David	B5, C24, I29, P6, CC14	Dreinhofer, Dana	B5, C24, I29, P6, CC14
DeAntoni, Carol	B5, C24, I29, P6, CC14	Druckemiller, Rochelle	B5, C24, I29, P6, CC14
Deay, David	B5, C24, I29, P6, CC14	Drzewiecki, Erin	B5, C24, I29, P6, CC14
Dec, Eric	B5, C24, I29, P6, CC14	Duczek, Roger	V12, V20, V21, V22, V23, V24, V25, V40
Deeble, Ben	C17, L7, N12, N39, S3, T1, T9, Y2	Dugan, Linda	B5, C24, I29, P6, CC14
Degenhart, Dawn	B5, C24, I29, P6, CC14	Dull, Julie	B5, C24, I29, P6, CC14
deGero, Beverly	B5, C24, I29, P6, CC14	Dunham, Janet	B5, C24, I29, P6, CC14
dela Montagne, Greta	T10, T66, V47, CC1, CC3, CC4	Dunne, Loretta	C26, C35, T78, AA15, CC1, CC4
Delker, Jennifer	B5, C24, I29, P6, CC14	Durham, Crystal	B5, C24, I29, P6, CC14
DeLuca, Matt	B5, C24, I29, P6, CC14	Durham, Dane	B5, C24, I29, P6, CC14
Dempsey, Marilyn	C26, C35, T78, AA15, CC1, CC4	East Pioneer Experimental Stewardship Program	I1, I6, J4, J6, J9, J32, J38, S4, S10, U4, X3, X4, AA1, AA2, AA40, AA41, AA42, AA43, AA47
Dehn, Charles	B5, C24, I29, P6, CC14	Eddlemon, Carol	B5, C24, I29, P6, CC14
Denison, Bill	C26, C35, T78, AA15, CC1, CC4	Edelstein, Eric	B5, C24, I29, P6, CC14
Denison, Lou	C26, C35, T78, AA15, CC1, CC4	Edmiston, Chuck	V22
Des Jardins, Robert	T70, AA22	Edwards, Paul	CC1, CC3
DeVaney, Lisa	B5, C24, I29, P6, CC14	Edwards, Richard	B5, C24, I29, P6, CC14
DeVasto, Ginny	B5, C24, I29, P6, CC14	Egbert, Anne	B5, C24, I29, P6, CC14
Devers, Cloyd	T10	Eigenberger, Kurt	B5, C24, I29, P6, CC14
Dexter, Fred	B5, C24, I29, P6, CC14	Eisentrager, Kimberly	C26, C35, T78, AA15, CC1, CC4
Dibble, Marcia	B5, C24, I29, P6, CC14	Elkins, Cynthia	B5, C24, I29, P6, CC14
Dieux, John	B5, C24, I29, P6, CC14	Ellentuck, Tamar	B5, C24, I29, P6, CC14
Dildine, Sandra	B5, C24, I29, P6, CC14	Elmendorf, David	B5, C24, C26, C35, I29, P6, T78, AA15, CC1, CC4, CC14
Dipert, Brian	C26, C35, T78, AA15, CC1, CC4		
District #3 Snowmobile Clubs	T10		
Dixon, Sheila	B5, C24, I29, P6, AA59, CC14		

<i>Name</i>	<i>Comment #</i>
Elting, Buff	B5, C24, I29, P6, CC14
Embry, Judith	C26, C35, T78, AA15, CC1, CC4
English, Rebecca	B5, C24, I29, P6, CC14
Ennis, Cris	B5, C24, I29, P6, CC14
Enright, Elizabeth	B5, C24, I29, P6, CC14
Environmental Protection Agency	A1, A2, A3, A4, A5, A6, A7, A8, A9, B5, C8, H9, H10, H11, I3, I4, I5, J2, J3, J5, J16, J29, K4, K5, K6, K8, K9, L4, L6, L8, N18, N24, O3, O4, O5, O6, O7, P1, R8, R15, S5, T1, T8, T9, T13, T37, T41, T49, T50, U9, U10, Y1, Z1, Z2, Z3, Z9, Z10, AA21, AA55, BB2, CC2, CC3, CC9, CC15, CC17
Erickson, Karen	B5, C24, I29, P6, CC14
Ervin, Michael	B5, C24, I29, P6, CC14
Esteve, Gregory	B5, C24, I29, P6, CC14
Eubank, Lynn	B5, C24, I29, P6, CC14
Evans, Dinda	B5, C24, C26, C35, I29, P6, T78, AA15, CC1, CC4, CC14
Evans, Michael W.	B5, C24, I29, P6, CC14
Everton, Clyde	B5, C24, I29, P6, CC14
F., Laurie	B5, C24, I29, P6, CC14
F., T.	B5, C24, I29, P6, CC14
Faas, Jacqueline	B5, C24, I29, P6, CC14
Fabian, Cynthia	B5, C24, I29, P6, CC14
Facteau, Matthew	B5, C24, I29, P6, CC14
Fahrenthold, Jerry	B5, C24, I29, P6, CC14
Faich, Ron	B5, C24, C26, C35, I29, P6, T78, AA15, CC1, CC4, CC14
Fain, Steven	B5, C24, I29, P6, CC14
Falcca, Peter	B5, C24, I29, P6, CC14
Farris, Annie	B5, C24, I29, P6, CC14
Feck, Denis	C26, C35, T78, AA15, CC1, CC4
Federgreen, Lesley	B5, C24, I29, P6, CC14
Feldman, Eli	B5, C24, I29, P6, CC14
Fell, Cynthia	C26, C35, T78, AA15, CC1, CC4
Felsing, Dawn	B5, C24, I29, P6, CC14
Felt, Gilda	B5, C24, I29, P6, CC14
Fenton, Jennifer	B5, C24, I29, P6, CC14
Ferejohn, Laura	B5, C24, I29, P6, CC14

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Ferguson, Sheryl	B5, C24, I29, P6, CC14
Ferris, Linda	B5, C24, I29, P6, CC14
Fiermonte, Alan	C26, C35, T78, AA15, CC1, CC4
Fiflis, Michael	B5, C24, I29, P6, CC14
Fike, William	B5, C24, I29, P6, CC14
Finan, Carole	C26, C35, T78, AA15, CC1, CC4
Fish, Mary	B5, C24, I29, P6, CC14
Fisher, Meg	C26, C35, T78, AA15, CC1, CC4
Fitch, James	C26, C35, T78, AA15, CC1, CC4
Fitzpatrick, Matt	B5, C24, I29, P6, CC14
Flanagan, Katy	C26, C35, T78, AA15, CC1, CC4
Fleming, Kerri	B5, C24, I29, P6, CC14
Fleming, Mackie	B5, C24, I29, P6, CC14
Fletcher, Judith	C26, C35, T10, T78, AA15, CC1, CC4
Fletcher, Mary L.	B5, C24, I29, P6, CC14
Flory, Rick	B5, C24, I29, P6, CC14
Flowers, Abbe	B5, C24, I29, P6, CC14
Flowers, Bobbie	C26, C35, T78, AA15, CC1, CC4
Floyd, Philip and Jennifer	C26, C35, T78, AA15, CC1, CC4
Foley, Jr., Robert	B5, C24, I29, P6, CC14
Foley-Reynolds, Chilton	B5, C24, I29, P6, CC14
Folnagy, Attila	B5, C24, I29, P6, CC14
Fong, Lindsey	B5, C24, I29, P6, CC14
Forehand, Dick	C26, C35, T78, AA15, CC1, CC4
Foreman, Edwina	B5, C24, I29, P6, CC14
Foss, Janice	C26, C35, T78, AA15, CC1, CC4
Foster, Dorothy	C26, C35, T78, AA15, CC1, CC4
Foster, Jim	T10, V90
Fouke, Bernard	B5, C24, I29, P6, CC14
Foundation for North American Wild Sheep	C4, C37
Fowlie, Patricia	T8, CC1, CC3, CC9
Franken, Jessica	B5, C24, I29, P6, CC14
Franklin, Nancy	B5, C24, I29, P6, CC14

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Frazee, Janis	B5, C24, I29, P6, CC14	Geist, Darrell	B5, C24, I29, P6, CC14
Fredenburg, Craig	T10	Genevich, Genny	C26, C35, T78, AA15, CC1, CC4
Fredrickson, Bill	T65, V2, V17, V27, V33, V78, V83, V84	Gentner, Darcy	B5, C24, I29, P6, CC14
Freeland, Chris	B5, C24, I29, P6, CC14	George, Christy	B5, C24, I29, P6, CC14
Freeland, Jeanne	B5, C24, I29, P6, CC14	George, Marvin	B5, C24, I29, P6, CC14
Freeman, Carl	B5, C24, I29, P6, CC14	Gibson, Alex	B5, C24, I29, P6, CC14
Freeman, Jacquelyn	B5, C24, I29, P6, CC14	Gierlach, Marian Baker	B5, C24, I29, P6, CC14
Frew, Peter	B5, C24, I29, P6, CC14	Giezentanner, John	B5, C24, I29, P6, CC14
Friedman, Kathleen	B5, C24, I29, P6, CC14	Gignac, David	B5, C24, I29, P6, CC14
Friedman, Valerie	B5, C24, I29, P6, CC14	Giguere, Ed	C26, C35, T78, AA15, CC1, CC4
Friends of the Bitterroot	B1, B5, C9, C10, I25, I26, L4, L10, N35, T61, U11, Z1, AA36, CC14	Gilbert, Michael	B5, C24, I29, P6, CC14
Frontz, Jeffri	B5, C24, I29, P6, CC14	Gilbert, Timothy	C26, C35, T78, AA15, CC1, CC4
Frye, Cathy	B5, C24, I29, P6, CC14	Gilbertson, Heidi	B5, C24, C26, C35, I29, P6, T78, AA15, CC1, CC4, CC14
Fuller, Michelle	B5, C24, I29, P6, CC14	Giles, William	B5, C24, I29, P6, CC14
Furman, Johana	B5, C24, I29, P6, CC14	Gilland, James	B5, C24, I29, P6, CC14
Furman, Victor	B5, C24, I29, P6, CC14	Gillett, Julia Marie	B5, C24, I29, P6, CC14
Gaasch, Ryan	V70, V81, V82,	Gilliland, Che'	B5, C24, I29, P6, CC14
Gabriel, Laurel	B5, C24, I29, P6, CC14	Gilliland, Donna	B5, C24, I29, P6, CC14
Galbavy, Pash	B5, C24, I29, P6, CC14	Gilroy, Keith	B5, C24, I29, P6, CC14
Galbraith, Eamon	B5, C24, I29, P6, CC14	Girardeau, Laura	B5, C24, I29, P6, CC14
Gallatin Wildlife Association	B5, C12, C13, C19, C20, C46, Q6, Q7, AA18, AA54, AA63, CC6, CC14	Gliva, Stephen	B5, C24, I29, P6, CC14
Gantert, Bernadine	C26, C35, T78, AA15, CC1, CC4	Glovan, Ronald	T10, T66, CC1, CC3, CC4
Gantt, Gene	C26, C35, T78, AA15, CC1, CC4	Glover, Todd	B5, C24, I29, P6, CC14
Gardner, Darrell	B5, C24, I29, P6, CC14	Godfredsen, Niels	B5, C24, I29, P6, CC14
Gardner, Richard	B5, C24, I29, P6, CC14	Gold, Marilyn	B5, C24, I29, P6, CC14
Garncarz, Jeremy	B5, C24, I29, P6, CC14	Goldman, Kenn	B5, C24, C26, C35, I29, P6, T78, AA15, CC1, CC4, CC14
Gartland, Chris	B5, C24, I29, P6, CC14	Gonnoud, Kathy	B5, C24, I29, P6, CC14
Gartner, Ted	B5, C24, I29, P6, CC14	Goodhue, Jacob	B5, C24, I29, P6, CC14
Garvin, Michael	C26, C35, T78, AA15, CC1, CC4	Goodier, R.V.	C26, C35, T78, AA15, CC1, CC4
Garza, Olivia	B5, C24, I29, P6, CC14	Goodlin, David	C26, C35, T78, AA15, CC1, CC4
Gaston, Cherie	B5, C24, I29, P6, CC14	Goodman, Len	B5, C24, I29, P6, CC14
Gathing, Nancy	B5, C24, I29, P6, CC14	Goodrow, Ken	B5, C24, I29, P6, CC14
Gaudreau, Brenda	B5, C24, I29, P6, CC14	Gorby, Diane	B5, C24, I29, P6, CC14
Gault, Marla	B5, C24, I29, P6, CC14	Gordon, Heather	B5, C24, I29, P6, CC14
Gehman, Steve	C26, C35, T78, AA15, CC1, CC4	Gordon, Mike	T65, V2, V75,
		Gorsetman, Mark	C26, C35, T78, AA15, CC1, CC4



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Gottesfeld, Christina	C26, C35, T78, AA15, CC1, CC4
Gouge, Patricia	T10
Grady, Anne	C26, C35, T78, AA15, CC1, CC4
Graham, Kimberley	B5, C24, I29, P6, CC14
Grant, Gordon	B5, C24, I29, P6, CC14
Grathwohl, Marya	B5, C24, I29, P6, CC14
Gray, Andrea	B5, C24, I29, P6, CC14
Gray, Jerry	B5, C24, I29, P6, CC14
Greater Yellowstone Coalition	B2, C7, C8, C24, C35, C36, C41, C45, G4, H4, H5, I7, J5, J9, J10, J12, J13, J14, J15, J18, J19, J26, K3, K7, L2, L7, M12, M13, M15, N9, N11, N12, N14, N17, N20, N21, N27, N33, N40, O10, P3, P4, P5, P8, P9, P19, R5, S13, T5, T6, T7, T8, T9, T10, T10, T37, T38, T39, T40, T41, V90, V96, Z1, AA9, AA10, AA11, AA12, AA15, AA23, AA46, AA49, AA57, AA58, AA59, AA33, CC4, CC6, CC7, CC9, CC11, CC12, CC15
Greene, Solo	B5, C24, I29, P6, CC14
Greenhalgh, Diana	C26, C35, T78, AA15, CC1, CC4
Greenleaf, Linda	B5, C24, I29, P6, CC14
Greenslade, Arlene	G5, T10, T65, T74, V2, V14, V15, V18, V19, V36, V40
Greenslade, Tom	T10, V40, V42
Greeson, Kathryn	B5, C24, I29, P6, CC14
Gregory, Colleen	B5, C24, I29, P6, CC14
Greiner, Tony	B5, C24, I29, P6, CC14
Griest, Frederic	B5, C24, I29, P6, CC14
Grimm, Kerry	B5, C24, I29, P6, CC14
Gross, Martin	B5, C24, I29, P6, CC14
Grosskopf, Mary Kay	B5, C24, I29, P6, CC14
Grove, Paul	B5, C24, I29, P6, CC14
Grover, Ravi	C26, C35, T78, AA15, CC1, CC4
Guignard, Lilace	B5, C24, I29, P6, CC14
Hadderman, Margaret	B5, C24, I29, P6, CC14
Hadley, Orval	D2, I1, J15, J23, J27, J36, M4, M18, R28, T10, Z7, AA13, AA14, AA64, CC19

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Hageman, Ellen	B5, C24, I29, P6, CC14
Hagenbarth Livestock	H12, H14, J6, J11, J17, S6, S9, S11, S14, S16, Z7, AA3, AA4, AA28, AA40, AA42, AA45, AA47
Hager, Jon	B5, C24, I29, P6, CC14
Hahler, Pamela	B5, C24, I29, P6, CC14
Haines, Karen	B5, C24, I29, P6, CC14
Haire, Lauren	C26, C35, T78, AA15, CC1, CC4
Hammer, Nancy	B5, C24, I29, P6, CC14
Hammond-Pettis, Elizabeth	B5, C24, I29, P6, CC14
Hanahan, Lillian	B5, C24, I29, P6, CC14
Hannum, Christine	B5, C24, I29, P6, CC14
Hansen Livestock Company	V2, V9
Hansen, Carole and Jim	C26, C35, T78, AA15, CC1, CC4
Hansen, Jay	B5, C24, I29, P6, CC14
Hansen, Ken and Val	C26, C35, T78, AA15, CC1, CC4
Hansen, M.F.	C26, C35, T78, AA15, CC1, CC4
Hansen, Max A. and Associates	T65, V2
Hanta, Hashi	B5, C24, I29, P6, CC14
Hanzel, Diane	B5, C24, I29, P6, CC14
Hara, Anita	B5, C24, I29, P6, CC14
Harden, Ron	B5, C24, I29, P6, CC14
Hardy, Paulette	T10, CC1, CC4
Hargreaves, Diane	C26, C35, T10, T78, AA15, CC1, CC4
Harmon, Guy	B5, C24, I29, P6, CC14
Harp, Rene	C26, C35, T78, AA15, CC1, CC4
Harper, Laura	B5, C24, I29, P6, CC14
Harper, Patricia	B5, C24, I29, P6, CC14
Harris, Catherine	B5, C24, I29, P6, CC14
Harris, Collin	B5, C24, I29, P6, CC14
Harris, Kathy	B5, C24, I29, P6, CC14
Harrison, Jennifer	B5, C24, I29, P6, CC14
Harrison, Randy	B5, C24, I29, P6, CC14
Harrison, Robin	B5, C24, I29, P6, CC14
Hart, Raymond	B5, C24, I29, P6, CC14

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Hart-vonKeller, Gretchen	B5, C24, I29, P6, CC14	Herrman, Kelly	V43, V57
Hartz, Barb	C26, C35, T78, AA15, CC1, CC4	Herron, Delana	B5, C24, I29, P6, CC14
Haseltine, Allan	B5, C24, I29, P6, CC14	Hervatin, Shirley	B5, C24, I29, P6, CC14
Hass, Marjorie	B5, C24, I29, P6, CC14	Hewitt, John	B5, C24, I29, P6, CC14
Hassinger, Nancy	B5, C24, I29, P6, CC14	Heywood, Michael	C26, C35, T78, AA15, CC1, CC4
Hattin, Donna	B5, C24, I29, P6, CC14	Hiatt, Richard	B5, C24, I29, P6, CC14
Hatton, Robert	C26, C35, T78, AA15, CC1, CC4	Hicks, David	B5, C24, I29, P6, CC14
Hauke, Frank	B5, C24, I29, P6, CC14	Hilborn, Doug	C26, C35, T78, AA15, CC1, CC4
Hausmann, Joseph	B5, C24, I29, P6, CC14	Hill, Margaret	B5, C24, I29, P6, CC14
Havill, Debra	B5, C24, I29, P6, CC14	Hilton, Richard	T10, T65
Hayes, Joseph	B5, C24, I29, P6, CC14	Himsl, Jeffrey	G2
Hayes, Lisa	C26, C35, T78, AA15, CC1, CC4	Himsl, Rebecca	G2
Heaning, Richard	C26, C35, T78, AA15, CC1, CC4	Hirsh, Sidney	B5, C24, I29, P6, CC14
Heberling, Ken	T10, T30, V28	Hittel, Earline	B5, C24, I29, P6, CC14
Hecht, Nathan	T66, CC1, CC3, CC4	Hixon, Ruth	B5, C24, I29, P6, CC14
Heckel, Jim	T5, CC1, CC3, CC4, CC13	Hodman, Amy	C26, C35, T78, AA15, CC1, CC4
Hedderman, Leigh	B5, C24, I29, P6, CC14	Hodsen, Brett	T10, CC4,
Heggland, Diane	B5, C24, I29, P6, CC14	Hoffman, Stanley	C26, C35, T78, AA15, CC1, CC4
Heggy, Gloria	B5, C24, I29, P6, CC14	Hofmeister, Barbara	B5, C24, I29, P6, CC14
Heinold, Christian	C26, C35, T78, AA15, CC1, CC4	Hogan, Pam	B5, C24, I29, P6, CC14
Hellekson, Lyndsay	B5, C24, I29, P6, CC14	Hogue, Charlie	B5, C24, I29, P6, CC14
Heller, James	B5, C24, I29, P6, CC14	Hohenberg, Adrienne	B5, C24, I29, P6, CC14
Hemingway, V.	B5, C24, I29, P6, CC14	Hoke, Rachel	B5, C24, I29, P6, CC14
Hemming, Ethan	B5, C24, I29, P6, CC14	Holden, Joshua	B5, C24, I29, P6, CC14
Hendrickson, Peter	B5, C24, I29, P6, CC14	Holden, Nichole	B5, C24, I29, P6, CC14
Hennegan, Kevin	B5, C24, I29, P6, CC14	Holland, Patrick	B5, C24, I29, P6, CC14
Hennessy, Tim	B5, C24, I29, P6, CC14	Hollenbeck, Lori	B5, C24, I29, P6, CC14
Henry, Bob	B5, C24, I29, P6, CC14	Hollinger, Janet	B5, C24, I29, P6, CC14
Henry, Christopher	B5, C24, I29, P6, CC14	Holmberg, Sheryl	C26, C35, T78, AA15, CC1, CC4
Herb, Ed	B5, C24, I29, P6, CC14	Holmes, Ronald	B5, C24, I29, P6, CC14
Herbert, Crystal	B5, C24, I29, P6, CC14	Holt, Grady	V9, V59
Herbert, R.J.	B5, C24, I29, P6, CC14	Holt, Joe	T10, T51
Herbst, Joe	B5, C24, I29, P6, CC14	Holtom, Roger	B5, C24, I29, P6, CC14
Herdlska, Robert	B5, C24, I29, P6, CC14	Holtz, Sigmund	C26, C35, T78, AA15, CC1, CC4
Hermann, Rick	B5, C24, I29, P6, CC14	Hondros, Maria	B5, C24, I29, P6, CC14
Herndon, Laura	B5, C24, C26, C35, I29, P6, T78, AA15, CC1, CC4, CC14	Honey, Ellen	B5, C24, I29, P6, CC14
Herrick, Michael	B5, C24, I29, P6, CC14	Honican, Albert	B5, C24, I29, P6, CC14

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Hook, Kristi	B5, C24, I29, P6, CC14
Hopkins, Patricia	B5, C24, I29, P6, CC14
Hopper, Pam	B5, C24, I29, P6, CC14
Horlings, Laurie	C26, C35, T78, AA15, CC1, CC4
Horvath, Melora	B5, C24, I29, P6, CC14
Hoskins, Richard	B5, C24, I29, P6, CC14
Hotchkiss, John	B5, C24, I29, P6, CC14
Hover, Kim	B5, C24, I29, P6, CC14
Howard, Greg	B5, C24, I29, P6, CC14
Howard, Judith	B5, C24, I29, P6, CC14
Howard, Lee	B5, C24, I29, P6, CC14
Howe, Marty	B5, C24, I29, P6, CC14
Howell, Noemi	B5, C24, I29, P6, CC14
Howell, PJ	B5, C24, I29, P6, CC14
Huber, Jeff	I28
Huber, Patrick	I17, I29, I30, P6, AA36, CC4
Hudock, Chris	C26, C35, T78, AA15, CC1, CC4
Huey, Terry	C26, C35, T78, AA15, CC1, CC4
Huggins, William	B5, C24, I29, P6, CC14
Hughes, Angie	B5, C24, I29, P6, CC14
Hughes, Brendan	C26, C35, T78, AA15, CC1, CC4
Hughes, Carroll	B5, C24, I29, P6, CC14
Hugins, Phyllis	B5, C24, I29, P6, CC14
Humke, Patrice	B5, C24, I29, P6, CC14
Hunt, Cashin	C26, C35, T78, AA15, CC1, CC4
Hunts, Stephen	B5, C24, I29, P6, CC14
Huntsman, Evan	V10
Hutchinson, Terry	B5, C24, I29, P6, CC14
Iager, Larry and Donna	T65, V2, V35,
Ilardi, Robert and Virginia	C26, C35, T78, AA15, CC1, CC4
Ingols, Kelley	B5, C24, I29, P6, CC14
Irons, Valerie	B5, C24, I29, P6, CC14
Irwin, Craig	B5, C24, I29, P6, CC14
Jackpine Savages Snowmobile Club	V87
Jackson, Cherifa	B5, C24, I29, P6, CC14

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Jacus, Anna	B5, C24, I29, P6, CC14
Jake, Vivienne	B5, C24, I29, P6, CC14
Janda, Karen	C26, C35, T78, AA15, CC1, CC4
Janicki, Clayton	B5, C24, I29, P6, CC14
Janowitz, Terry	B5, C24, I29, P6, CC14
Janusko, Robert	C26, C35, T78, AA15, CC1, CC4
Jarvis, Keith	B5, C24, I29, P6, CC14
Jefferson County Commission	Q10
Jefferson River Watershed Council	J8, Q1, Z6, Z7, Z8,
Jeffries, Lynne	C26, C35, T78, AA15, CC1, CC4
Jenkins, Karlyn	B5, C24, I29, P6, CC14
Jenks, Alan	B5, C24, I29, P6, CC14
Jensen, Nick	V87
Jensen, Tanya	B5, C24, I29, P6, CC14
Jette, Nichelle	B5, C24, I29, P6, CC14
Jochem, Nancy, Dan, Miles and Emily	T78, AA15, CC4
Johnson, Connie	T5, T8, Y3, CC1
Johnson, Curtis	B5, C24, I29, P6, CC14
Johnson, J. Darrell	T74, V30,
Johnson, Erin	B5, C24, I29, P6, CC14
Johnson, Kim	B5, C24, I29, P6, CC14
Johnson, Marvin	V87,
Johnson, Richard	T10
Johnson, Suzan	B5, C24, I29, P6, CC14
Johnson, Tamika	B5, C24, I29, P6, CC14
Johnston, Bob	C26, C35, T78, AA15, CC1, CC4
Johnston, Julie	Q8, T5, T8, T10, CC3, CC4
Jones, Dorothy	B5, C24, I29, P6, CC14
Jones, Jack	H1, M2, M3, M4, M7, M8, M9, M11, M14, N4, N5, N25, N26, N32, Q2, Q3, Q4, Q11, R2, R14, R25, R30, S15, T74AA5, AA44, AA56, AA62, AA63
Jones, John	B5, C24, I29, P6, CC14
Jones, Lori	C26, C35, T78, AA15, CC1, CC4
Jordan, Lawrence	B5, C24, I29, P6, CC14

<i>Name</i>	<i>Comment #</i>	<i>Name</i>	<i>Comment #</i>
Jordan, Pat	B5, C24, I29, P6, CC14	Kendall, Vaughan	B5, C24, I29, P6, CC14
Joseph, Sharon	C26, C35, T78, AA15, CC1, CC4	Kennedy, Bill	B5, C24, I29, P6, CC14
Josephs, Emmy and Clark	C26, C35, T78, AA15, CC1, CC4	Kennison, Leigh	B5, C24, I29, P6, CC14
Joyce, Susan	B5, C24, I29, P6, CC14	Kenney, Kathryn	B5, C24, I29, P6, CC14
Judson, Sarah	B5, C24, I29, P6, CC14	Kent, Wendy	B5, C24, I29, P6, CC14
Jutz, Deborah	C26, C35, T78, AA15, CC1, CC4	Kern, Donald	B5, C24, C26, C35, I29, P6, T78, AA15, CC1, CC4, CC14
Kadrmass, Tim	B5, C24, C26, C35, I29, P6, T78, AA15, CC1, CC4, CC14	Kern, Kimberly	B5, C24, I29, P6, CC14
Kaeding, Kathleen	C26, C35, T78, AA15, CC1, CC4	Kerttula, Mary	B5, C24, I29, P6, CC14
Kalina, Charles	C26, C35, T78, AA15, CC1, CC4	Kesler, Dale and Sheree	B5, C24, I29, P6, CC14
Kalina, Matt	B5, C24, I29, P6, CC14	Ketterer, Marcia	B5, C24, I29, P6, CC14
Kandl, Edward	B5, C24, I29, P6, CC14	Kever, Jeanne	B5, C24, I29, P6, CC14
Kantor, Kathryn	B5, C24, I29, P6, CC14	Keyes, Larry and Peg	C26, C35, T78, AA15, CC1, CC4
Kappy, Glen	B5, C24, I29, P6, CC14	Khanlian, Richard	B5, C24, I29, P6, CC14
Karcher, Barbara	B5, C24, I29, P6, CC14	Killay, Sharon	B5, C24, I29, P6, CC14
Karges, Robert	B5, C24, I29, P6, CC14	Kilmer, Kathy	B5, C24, I29, P6, CC14
Karrie, McCartney	B5, C24, I29, P6, CC14	Kilmer, Tom	B5, C24, I29, P6, CC14
Karson, Sharon	B5, C24, I29, P6, CC14	Kimmons, Anthony	C26, C35, T78, AA15, CC1, CC4
Katan, Paul	B5, C24, I29, P6, CC14	King, David	B5, C24, I29, P6, CC14
Katanick, Cindy	B5, C24, I29, P6, CC14	Kinoshita, William	V27, V78, V83,
Kaufman, Sonya	B5, C24, I29, P6, CC14	Kintsch, Eileen	B5, C24, I29, P6, CC14
Kaufman-Moses, Lilly	B5, C24, I29, P6, CC14	Kirby, M.D.	B5, C24, I29, P6, CC14
Keefer, Mary Ann	B5, C24, I29, P6, CC14	Kirkland, Laura	B5, C24, I29, P6, CC14
Keefer, Nina	B5, C24, I29, P6, CC14	Kirschling, Karen	C26, C35, T78, AA15, CC1, CC4
Keele, Van P.	G5, T5, T66, CC1	Kittel, Barbara	B5, C24, I29, P6, CC14
Keene, Carole	C26, C35, T78, AA15, CC1, CC4	Kitzman, Irene	C26, C35, T78, AA15, CC1, CC4
Kerr, Michelle	B5, C24, I29, P6, CC14	Kjonaas, Raechel	B5, C24, I29, P6, CC14
Keinath, Marilyn	B5, C24, I29, P6, CC14	Klawitter, Ralph	No comment to address.
Keith, Kristin	B5, C24, I29, P6, CC14	Klett, Karen	B5, C24, I29, P6, CC14
Keith, Tom	V27	Klinefelter, Michael	B5, C24, I29, P6, CC14
Keller, Maureen	B5, C24, I29, P6, CC14	Klinker, Leo	B5, C24, I29, P6, CC14
Kelley, Scott	T1, T10	Kluesner, Russ	T81, V3
Kelly, Jean	C26, C35, T78, AA15, CC1, CC4	Knighton, Paula	B5, C24, I29, P6, CC14
Kelly, Michael	B5, C24, I29, P6, CC14	Koch, Scott	B5, C24, I29, P6, CC14
Kelly, Wayne	B5, C24, I29, P6, CC14	Kolb, Judy	B5, C24, I29, P6, CC14
Kendall, Matthew	B5, C24, I29, P6, CC14	Koontz, Jesse	V11, V12, V13
		Kopacka, Roxanne	B5, C24, I29, P6, CC14
		Koplik, Mark	C26, C35, T78, AA15, CC1, CC4



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Koster, Fred	C26, C35, T78, AA15, CC1, CC4
Krach, Judy	B5, C24, I29, P6, CC14
Kraynak, Ed	B5, C24, I29, P6, CC14
Krebs, Fred	B5, C24, I29, P6, CC14
Krecker, Jon	B5, C24, I29, P6, CC14
Krell, Elinore	C26, C35, T78, AA15, CC1, CC4
Krinsky, James	C26, C35, T78, AA15, CC1, CC4
Kroeger, Sylvia	B5, C24, I29, P6, CC14
Kron, Kathy	B5, C24, I29, P6, CC14
Kroth, Denise	B5, C24, I29, P6, CC14
Kruzic, Debby	B5, C24, I29, P6, CC14
Kuczer, Roman	T41
Kuehnling, William	B5, C24, I29, P6, CC14
Kunkler, Scott	B5, C24, I29, P6, CC14
Kuntz, Laurie	B5, C24, I29, P6, CC14
Kurowski, Bryan	B5, C24, I29, P6, CC14
Kurtzhall, Teresa	N12, T10,
Kurz, Ricky	B5, C24, I29, P6, CC14
Kurz, Robert	C26, C35, T78, AA15, CC1, CC4
Kuyper, Kathy	B5, C24, I29, P6, CC14
Kvaas, Robert	B5, C24, I29, P6, CC14
La Cense Montana Ranch	L1, T65, V2, V36, V39,
Lambeth, Larry	C26, C35, T78, AA15, CC1, CC4
Landa, Marty	B5, C24, I29, P6, CC14
Landin, Mireya	B5, C24, I29, P6, CC14
Landon, Keith	B5, C24, I29, P6, CC14
Lane, Earl	C26, C35, T78, AA15, CC1, CC4
Lang, Sue and Roger	CC1, CC3, CC4, CC13
Langer, Richard	C26, C35, T78, AA15, CC1, CC4
Lanier, Vicka	B5, C24, I29, P6, CC14
Lansdowne, Jerry	C26, C35, T78, AA15, CC1, CC4
Lanskey, Marcus	B5, C24, I29, P6, CC14
Lantz, Randy	B5, C24, I29, P6, CC14
Larcom, Julian	B5, C24, I29, P6, CC14
Larsen, Brent	C26, C35, T78, AA15, CC1, CC4

<i>Name</i>	<i>Comment #</i>
Larson, Eric	B5, C24, I29, P6, CC14
Larson, Garvin	B5, C24, I29, P6, CC14
Larson, Paul	B5, C24, C26, C35, I29, P6, T78, AA15, CC1, CC4, CC14
Larson, Susan	B5, C24, I29, P6, CC14
Last, Patricia	B5, C24, I29, P6, CC14
Latta, George	B5, C24, I29, P6, CC14
Laves-Mearini, Courtney	B5, C24, I29, P6, CC14
Laybourn, Jim	B5, C24, I29, P6, CC14
Leahy, Beth	B5, C24, I29, P6, CC14
Leahy, Martha	B5, C24, I29, P6, CC14
Leblang, Linda	C26, C35, T78, AA15, CC1, CC4
Lebwohl, Michael	Q8, CC1, CC3, CC4, CC13
Lechner, Sheila	C26, C35, T78, AA15, CC1, CC4
Lee, Wood	C26, C35, T78, AA15, CC1, CC4
Lee-Olsen, Dawna	B5, C24, I29, P6, CC14
Leeper, Erik	B5, C24, I29, P6, CC14
Lehman, Omar	B5, C24, I29, P6, CC14
Leissa, Arthur	C26, C35, T78, AA15, CC1, CC4
Lemon, Michelle	B5, C24, I29, P6, CC14
Lenfestey, Edmund	B5, C24, I29, P6, CC14
Lenz, Dennis	C26, C35, T78, AA15, CC1, CC4
Leonard, Claire	B5, C24, I29, P6, CC14
Leopold, Autumn	B5, C24, I29, P6, CC14
Lesica, Peter	C6, C14, C25, C43, D1, K11, M19, S7, X1, X2, X6, AA39, AA61
Letendre, Michael	B5, C24, I29, P6, CC14
Levens, Harold	CC1, CC3, CC4, CC13
Levin, Ross	B5, C24, I29, P6, CC14
Levitt, Suzanne	B5, C24, I29, P6, CC14
Libnic, Annette and Mort Levine	B5, C24, I29, P6, CC14
Lichtenstein, Bruce	B5, C24, I29, P6, CC14
Lieberman, Ilene	B5, C24, I29, P6, CC14
Lien, David	B5, C24, C26, C35, I29, P6, T78, AA15, CC1, CC4, CC14
Lindquist, Steven	B5, C24, I29, P6, CC14
Link, David	B5, C24, I29, P6, CC14

<i>Name</i>	<i>Comment #</i>	<i>Name</i>	<i>Comment #</i>
Linville, Mikey	B5, C24, I29, P6, CC14	Makela, Lorri	C26, C35, T78, AA15, CC1, CC4
Liolis, Donna	B5, C24, I29, P6, CC14	Maldonado, Chris	B5, C24, I29, P6, CC14
Little Bird, Chris	B5, C24, I29, P6, CC14	Maltz, Esta	B5, C24, I29, P6, CC14
Little, Gayle	B5, C24, I29, P6, CC14	Malucelli, Andrew	B5, C24, I29, P6, CC14
Little, Terri	B5, C24, I29, P6, CC14	Mancoronal, William	T10
Littleman, Tina	B5, C24, I29, P6, CC14	Mandre, Sylvia	C26, C35, T78, AA15, CC1, CC4
Liu-Elizabeth, Emily	B5, C24, I29, P6, CC14	Marancik, David	C26, C35, T78, AA15, CC1, CC4
Llewellyn, Robin	B5, C24, I29, P6, CC14	Marchese, John	B5, C24, I29, P6, CC14
Lockwood, William	B5, C24, I29, P6, CC14	Marcu, Kelly	B5, C24, I29, P6, CC14
Lone Wolf Photography	C38	Marcus, Jack David	B5, C24, I29, P6, CC14
Lorang, Andrea	B5, C24, I29, P6, CC14	Marlowe, Anthony	C26, C35, T78, AA15, CC1, CC4
Love, Casey and Maris	V97	Marquis, Dortha	C26, C35, T78, AA15, CC1, CC4
Lucas, Steven	C26, C35, T78, AA15, CC1, CC4	Marsh, Kyle	T10, CC19
Luccock, Phil	B5, C24, I29, P6, CC14	Marsh, Melba M.	B5, C24, I29, P6, CC14
Lund, Sierra	B5, C24, I29, P6, CC14	Marshall, Lisa	B5, C24, C26, C35, I29, P6, T78, AA15, CC1, CC4, CC14
Lundsten, Myrel	B5, C24, I29, P6, CC14	Martin, Maryellen	C26, C35, T78, AA15, CC1, CC4
Lundy, Jean	B5, C24, I29, P6, CC14	Martin, Michael	B5, C24, I29, P6, CC14
Lunow, Linda	B5, C24, I29, P6, CC14	Martin, Michele	B5, C24, I29, P6, CC14
Luxem, David	C26, C35, T78, AA15, CC1, CC4	Martin, Ron	B5, C24, I29, P6, CC14
MacAlpine, Deirdre	B5, C24, I29, P6, CC14	Martineau, Linden	Q8, T1, T5, T8, T10, T66, CC1, CC3, CC4, CC13
MacArthur, June	B5, C24, I29, P6, CC14	Martinell, William and Kristina	N8, N15, N30, AA24, AA35
MacCallum, Crawford	B5, C24, I29, P6, CC14	Martinez, Veronica	B5, C24, I29, P6, CC14
Macfarlane, Bruce	C26, C35, T78, AA15, CC1, CC4	Marxer, Ray and Sue	F1, H8, H17, J4, J7, L2, L7, N16, N22, T20, U8, Z4, AA32, AA42, AA47
Mack, Linda	C26, C35, T78, AA15, CC1, CC4	Marzec, Cheryl	B5, C24, I29, P6, CC14
Madgic, Jennifer	CC1, CC3, CC4, CC13	Massey, Aaron	B5, C24, I29, P6, CC14
Madison County Commissioners	E1, E2, E3, E4, G4, G7, I22, I23, I24, K1, K2, K10, K12, K13, L9, N2, N7, N13, N23, N24, N29, N37, R4, R6, R12, R13, R16, R17, R18, S1, S2, S5, T11, T12, T30, T42, T43, T44, T45, T46, T47, T48, T74, T75, T76, T77, U13, W1, W2, W3, W6, X5, Z7, BB1	Mathews, Sara	B5, C24, I29, P6, CC14
Magnus, Donna	B5, C24, I29, P6, CC14	Matt, Jason	B5, C24, I29, P6, CC14
Mahan, Gerald	B5, C24, I29, P6, CC14	Mayer, Dan	V40, V42,
Mahoney, Janet	C26, C35, T78, AA15, CC1, CC4	Mayer, Vic	B5, C24, I29, P6, CC14
Mahrt, Jack	B5, C24, I29, P6, CC14	Mayo, Michael John	B5, C24, I29, P6, CC14
Maia, Maia	B5, C24, I29, P6, CC14	McAllister, Kay	CC13, Z2
		McArdle, Sara	C26, C35, T78, AA15, CC1, CC4

<i>Name</i>	<i>Comment #</i>
McBride, Brenda Sherman	B5, C24, I29, P6, CC14
McCarthy, Sandra	C26, C35, T78, AA15, CC1, CC4
McCarty, James	B5, C24, I29, P6, CC14
McClain, Barbara	B5, C24, I29, P6, CC14
McCleary, Jr., Harold	B5, C24, I29, P6, CC14
McClintock, Catherine	B5, C24, I29, P6, CC14
McCoe, Tracy	B5, C24, I29, P6, CC14
McConnaughey, Sarah	B5, C24, I29, P6, CC14
McConnell, Karen	C26, C35, T78, AA15, CC1, CC4
McCreary, Jan	B5, C24, I29, P6, CC14
McDowell, Christine	B5, C24, I29, P6, CC14
McEvers, Charles	B5, C24, I29, P6, CC14
McEvoy, James	B5, C24, I29, P6, CC14
McFadzen, Mary	B5, C24, I29, P6, CC14
McGintya, Alison	B5, C24, I29, P6, CC14
McGlynn, Shawn	T66, CC3, CC4, CC1
McGrew II, Glen	B5, C24, I29, P6, CC14
McGuffin, Patrick	B5, C24, I29, P6, CC14
McGuire, Matthew	B5, C24, I29, P6, CC14
McGuire, Nancy	B5, C24, I29, P6, CC14
McKean, John	B5, C24, I29, P6, CC14
McKey, Jack	V69
McLane, John	B5, C24, I29, P6, CC14
McLaughlin, Blair	P6, CC14
McLean, Mary	B5, C24, I29, P6, CC14
McLendon, Carole	B5, C24, C26, C35, I29, P6, T78, AA15, CC1, CC4, CC14
McMahon, Alisa	B5, C24, I29, P6, CC14
McMullen, Ann	B5, C24, I29, P6, CC14
McMullen, Colleen	B5, C24, I29, P6, CC14
McNeill, Stacy	C26, C35, T78, AA15, CC1, CC4
McNiece, Jim	B5, C24, I29, P6, CC14
Meeks, Diane	B5, C24, I29, P6, CC14
Meinerz, Heather	B5, C24, I29, P6, CC14
Meinhold, Judy	B5, C24, I29, P6, CC14
Melka, Peter	B5, C24, I29, P6, CC14
Melton, Linda	B5, C24, I29, P6, CC14
Melville, Steve	B5, C24, I29, P6, CC14
Mendez, Angie	B5, C24, I29, P6, CC14

<i>Name</i>	<i>Comment #</i>
Mendoza, Latifah	B5, C24, I29, P6, CC14
Menicucci, Teresa	B5, C24, I29, P6, CC14
Merenda, Michael	B5, C24, I29, P6, CC14
Mereness, Thomas	B5, C24, I29, P6, CC14
Messinger, Chad	C26, C35, T78, AA15, CC1, CC4
Metcalf, Steve	B5, C24, I29, P6, CC14
Metzger, Mark	B5, C24, I29, P6, CC14
Meyer, Curt	Q8, T10, T68, CC3, CC4, CC13
Meyer, Robert G.	B5, C24, I29, P6, CC14
Meyers, Jeffrey	B5, C24, I29, P6, CC14
Michaels, Laura	B5, C24, I29, P6, CC14
Michaud, Pamela	B5, C24, I29, P6, CC14
Middaugh, Linda	B5, C24, I29, P6, CC14
Mihale, Paulette	B5, C24, I29, P6, CC14
Mikalsen, Amanda	B5, C24, I29, P6, CC14
Miles, Mark	T10
Mill, Timothy	B5, C24, I29, P6, CC14
Miller, Allison	B5, C24, I29, P6, CC14
Miller, Douglas	C26, C35, T78, AA15, CC1, CC4
Miller, Eric	B5, C24, I29, P6, CC14
Miller, Frances	C26, C35, T78, AA15, CC1, CC4
Miller, Ken	B5, C24, I29, P6, CC14
Miller, Patrick	B5, C24, I29, P6, CC14
Miller, Peter	B5, C24, I29, P6, CC14
Miller, Sandra	B5, C24, I29, P6, CC14
Mills, Ashea	C26, C35, T78, AA15, CC1, CC4
Mills, Rebecca	B5, C24, I29, P6, CC14
Minerva, Val	B5, C24, I29, P6, CC14
Minnix, Amanda	B5, C24, I29, P6, CC14
Misirlic, Lola	B5, C24, I29, P6, CC14
Mitzel, Boomer	B5, C24, I29, P6, CC14
Moenkhaus, David	C26, C35, T78, AA15, CC1, CC4
Mogen, Jill	B5, C24, I29, P6, CC14
Mohorich, Phillip	B5, C24, I29, P6, CC14
Moloney, Rich	B5, C24, I29, P6, CC14
Monsimer, Hannah	B5, C24, I29, P6, CC14
Montana Council of Gem and Mineral Societies	T10

<i>Name</i>	<i>Comment #</i>	<i>Name</i>	<i>Comment #</i>
Montana DEQ, Water Quality	N6, R29, Z1, Z12, Z13	Moose Camp Stock Association (Bob Kearns)	G4, N1, S10, U1, X7, AA27, AA43
Montana Fish, Wildlife and Parks	C5, C39, C40, D4, F7, H13, I32, I33, I34, I35, I36, I37, I38, J22, J34, L6, O1, O2, O8, O9, Q16, T2, T74, U6, V6, V7, V8, Z1, Z14, Z15, AA6, AA7, AA8, AA9, AA29, AA47, AA58	Morace, Marjorie	B5, C24, I29, P6, CC14
Montana Native Plant Society	Y5	Moran, Annette	B5, C24, I29, P6, CC14
Montana River Action (Joe Gutkoski)	B5, Q7, AA54, CC1, CC13, CC15	Moran, Autumn	B5, C24, I29, P6, CC14
Montana State Historic Preservation Office	C6, F2, F3, F4, F8, F9, H2, M17, M19	Moran, James	B5, C24, I29, P6, CC14
Montana Trail Vehicle Riders Association	B3, B7, R11, R27, T3, T4, T10, T24, T25, T26, T27, T28, T29, T30, T31, T32, T33, T34, T35, T36, AA51	Moran, Liana	B5, C24, I29, P6, CC14
Montana Trout Unlimited (Bruce Farling)	I8, I9, I10, I11, I12, I13, K4, N12, U3, Z1, Z3	Moran, Michael	B5, C24, I29, P6, CC14
Montana Wilderness Association-Madison -Gallatin Field Office	G2, J35, L2, L7, T1, T10, T21, T37, T60, T66, T67, CC3, CC4, CC13, CC15	Morello, Phyl	B5, C24, I29, P6, CC14
Montana Wilderness Association- Beaverhead Field Office	T10, T37, T60, T67, CC4	Moreno, Paul	B5, C24, I29, P6, CC14
Montana Wildlife Federation	C4, C7, C10, C24, C26, C27, C28, C36, G5, I27, R19, S8, AA34, AA48	Morgan, Edward	B5, C24, I29, P6, CC14
Montanans for Quiet Recreation	G5, R26, T1, T8, T10, T21, T39, V9, V45, V48, V49, V50, V51, V52, V53, V54, V55, V56, V58, CC9	Morgan, Michelle	B5, C24, I29, P6, CC14
Montgomery, Chuck	B5, C24, I29, P6, CC14	Morgan, Riley	B5, C24, I29, P6, CC14
Moore, Estella	B5, C24, I29, P6, CC14	Morgan, Susan	B5, C24, I29, P6, CC14
Moore, Judy	B5, C24, I29, P6, CC14	Morresi, Gian Andrea	C26, C35, T78, AA15, CC1, CC4
Moore, Steve	T5, T10, CC8	Morrighan, Anne	B5, C24, I29, P6, CC14
		Morrison, Mary Lou	B5, C24, C26, C35, I29, P6, T78, AA15, CC1, CC4, CC14
		Mortenson, Darlene	B5, C24, I29, P6, CC14
		Moss, Paul	C26, C35, T78, AA15, CC1, CC4
		Mueller, Erich	B5, C24, I29, P6, CC14
		Mullarkey, Mike	C26, C35, T78, AA15, CC1, CC4
		Mulligan, Glorian	B5, C24, I29, P6, CC14
		Mungle, Terri	B5, C24, I29, P6, CC14
		Munis, Brian	T10
		Munro, Andrea	B5, C24, I29, P6, CC14
		Murray, Dan	C26, C35, T78, AA15, CC1, CC4
		Nasif, Maria	B5, C24, I29, P6, CC14
		National Wildlife Federation	C4, C8, C10, C11, C17, C26, C44, H16, L5, L7, N12, N26, T10, T41, AA20, AA29, AA65
		Native Forest Network	T8, T10, CC1, CC3, CC4, CC5, CC10
		Neal, Chuck	B5, C24, I29, P6, CC14
		Nedrow, Allan	B5, C24, I29, P6, CC14
		Needham, Raymond	B5, C24, I29, P6, CC14
		Neft, Robin	B5, C24, I29, P6, CC14



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Nelson, Chris	B5, C24, I29, P6, CC14
Nelson, Roger	T25
Nelson, Rose	T25
Nemanic, Donna	B5, C24, I29, P6, CC14
Neville, Cornelia	B5, C24, I29, P6, CC14
Newell, John	C26, C35, T78, AA15, CC1, CC4
Nichol, Lois	C26, C35, T78, AA15, CC1, CC4
Nicholas, Dafydd	C26, C35, T78, AA15, CC1, CC4
Nichols, Angela	C26, C35, T78, AA15, CC1, CC4
Nickel, Doug	B5, C24, I29, P6, CC14
Nikolaus, Susan	B5, C24, I29, P6, CC14
Niosi, Dan	B5, C24, I29, P6, CC14
Nissl, Jan	B5, C24, C26, C35, I29, P6, T78, AA15, CC1, CC4, CC14
Nitz, Jennifer	B5, C24, I29, P6, CC14
Nix, Brenda	B5, C24, I29, P6, CC14
No Name	T74, V17, V38
Nobles, William	B5, C24, I29, P6, CC14
Noll, Judy	B5, C24, I29, P6, CC14
Norris, Robert	C26, C35, T78, AA15, CC1, CC4
Norte, Michael	C26, C35, T78, AA15, CC1, CC4
Northcutt, Robert	B5, C24, I29, P6, CC14
Noseworthy, Steve	B5, C24, I29, P6, CC14
Novak, Louis	B5, C24, I29, P6, CC14
Oakley, Cledith E.	C10, C35, P2, T10, AA19, CC4, CC13
Obenchain, Dave	C26, C35, T78, AA15, CC1, CC4
O'Brien, Frances	B5, C24, I29, P6, CC14
Oden, Kristina	B5, C24, I29, P6, CC14
Odonnell, Jim	B5, C24, I29, P6, CC14
Office of the Governor	E2, E3
Oggiono, Nanette	B5, C24, I29, P6, CC14
Oker, Teri	C26, C35, T78, AA15, CC1, CC4
Olicker, Carol	B5, C24, I29, P6, CC14
Oliver, Jean	B5, C24, I29, P6, CC14
Oliver, Randy	B5, C24, I29, P6, CC14

<i>Name</i>	<i>Comment #</i>
Olivero, David	B5, C24, I29, P6, CC14
Olonia, Joseph	B5, C24, I29, P6, CC14
Olson, Darryl	B5, C24, I29, P6, CC14
Olson, Jane	B5, C24, I29, P6, CC14
Omer, Don and Anne	B5, C24, I29, P6, CC14
Oneal, Kelly	B5, C24, I29, P6, CC14
Ordenez, Richard	B5, C24, I29, P6, CC14
Orr, Jeff	B5, C24, I29, P6, CC14
Orr, John	B5, C24, I29, P6, CC14
Orsini, Barb	B5, C24, I29, P6, CC14
Orzechowski, Larry	B5, C24, I29, P6, CC14
Osmon, Deborah	B5, C24, I29, P6, CC14
Ostberg, Anne	C26, C35, T78, AA15, CC1, CC4
Overholt, Roger	B5, C24, I29, P6, CC14
Owen, Dusty	T10
Owens, Mary	B5, C24, I29, P6, CC14
Ozarski, Jill	B5, C24, I29, P6, CC14
Ozkan, Dogan	B5, C24, I29, P6, CC14
Paddock, Margaret	B5, C24, I29, P6, CC14
Page, Bobbi	B5, C24, I29, P6, CC14
Pahre, James	C26, C35, T78, AA15, CC1, CC4
Paley, Jan	B5, C24, I29, P6, CC14
Palmeter, Jean	C26, C35, T78, AA15, CC1, CC4
Pan, Pinky Jain	B5, C24, I29, P6, CC14
Pannabecker, Virginia	B5, C24, I29, P6, CC14
Papple, Robbin	B5, C24, I29, P6, CC14
Parker, Brenda	B5, C24, I29, P6, CC14
Parks, Carla	B5, C24, I29, P6, CC14
Parks, Shawn	B5, C24, I29, P6, CC14
Partansky, Michael	C26, C35, T78, AA15, CC1, CC4
Parwana, Noorjahan	B5, C24, I29, P6, CC14
Paschke, Elaine	C26, C35, T78, AA15, CC1, CC4
Patanelli, John	C26, C35, T78, AA15, CC1, CC4
Patrick, Chris	B5, C24, I29, P6, CC14
Patrick, Todd	B5, C24, I29, P6, CC14
Paul, Manoj	B5, C24, I29, P6, CC14
Pavia, Sally	B5, C24, I29, P6, CC14

<i>Name</i>	<i>Comment #</i>	<i>Name</i>	<i>Comment #</i>
Payne, Gillian	B5, C24, I29, P6, CC14	Pond, Rick	C26, C35, T78, AA15, CC1, CC4
Peach, Elizabeth	B5, C24, I29, P6, CC14	Pope, David	C14, C24, C26, C35, I29, P6, T6, T78, AA15, CC1, CC4
Pearce, Chad	C26, C35, T78, AA15, CC1, CC4	Porter, Leroy	B5, C24, I29, P6, CC14
Pearson, Candee	B5, C24, I29, P6, CC14	Post, Dianne	B5, C24, I29, P6, CC14
Pedersen, John	B5, C24, I29, P6, CC14	Pratt, Virginia	B5, C24, I29, P6, X1, X2, X3, X4, X5, CC14
Peirce, Susan	B5, C24, I29, P6, CC14	Predator Conservation Alliance	B2, C8, C24, C35, C36, C41, C45, G4, H4, H5, I7, J5, J9, J10, J12, J13, J14, J15, J18, J19, J26, K3, K7, L2, L7, M12, M13, M15, N9, N11, N12, N14, N17, O10, P3, P4, P5, R5, T5, T6, T7, T8, T9, T10, T37, T38, T39, T40, T41, V90, 96, Z1, AA9, AA10, AA11, AA12, AA15, AA46, AA49, AA57, AA58, AA59, CC6, CC7, CC9, CC11, CC12, CC15
Pellet, Russell and Misty, Brock, Derek and Tarin	M14, T10, T23, Y6	Preudhomme, John	C26, C35, T78, AA15, CC1, CC4
Pendergrass, Robert	B5, C24, I29, P6, CC14	Preuss, G.	C26, C35, T78, AA15, CC1, CC4
Pepper, Sarah	B5, C24, I29, P6, CC14	Primeaux, Suzanne	B5, C24, I29, P6, CC14
Perea, Darla	B5, C24, I29, P6, CC14	Printz, Lisa	B5, C24, I29, P6, CC14
Perez, Luiz	B5, C24, I29, P6, CC14	Public Land Access Association	B3, G5, M3, M14, N32, Q7, R14, R19, R20, R30, T74, T80, AA67
Perrone, Katherine	C26, C35, T78, AA15, CC1, CC4	Pulford, Bruce	B5, C24, I29, P6, CC14
Perry-Jones, Jean	B5, C24, I29, P6, CC14	Purcell, Courtney	B5, C24, I29, P6, CC14
Peternel, Nadine	B5, C24, I29, P6, CC14	Purvis, Russ	B5, C24, I29, P6, CC14
Petersen, John	C26, C35, T78, AA15, CC1, CC4	Qualls, Corethia	B5, C24, I29, P6, CC14
Peterson, Dale	C26, C35, T78, AA15, CC1, CC4	Quintana, David	B5, C24, I29, P6, CC14
Peterson, Kimberly	B5, C24, I29, P6, CC14	Rabin, Barry	C26, C35, T78, AA15, CC1, CC4
Peterson, Robert	T10	Rabinowitz, Rebecca	B5, C24, I29, P6, CC14
Petoskey, Rox	B5, C24, I29, P6, CC14	Racey, Wallace	C26, C35, T78, AA15, CC1, CC4
Pevarnik, Shirley	B5, C24, I29, P6, CC14	Rachlis, Sandra	CC1
Pheneger, Tracy	B5, C24, I29, P6, CC14	Radau, Skip	B5, C24, I29, P6, CC14
Phillips, Ali	B5, C24, I29, P6, CC14	Radovich, Nicholas	T5, CC1, CC3, CC4, CC5, CC9, CC15
Phillips, Patricia	B5, C24, I29, P6, CC14	Raehse, Gary and Veronica	C26, C35, T78, AA15, CC1, CC4
Phillips, Tom	B5, C24, I29, P6, CC14		
Philpot, Judith	B5, C24, I29, P6, CC14		
Phipps, Maria	B5, C24, I29, P6, CC14		
Pickel, HollyMay	B5, C24, I29, P6, CC14		
Pierce, Brian	C26, C35, T78, AA15, CC1, CC4		
Pierce, Jon	B5, C24, I29, P6, CC14		
Pierpont, Leslie	B5, C24, I29, P6, CC14		
Pilling, Amy	B5, C24, I29, P6, CC14		
Pine, Robert	B5, C24, I29, P6, CC14		
Pinsker, Aaron	B5, C24, I29, P6, CC14		
Pippin, Carol	B5, C24, I29, P6, CC14		
Pitblado, Nancy	B5, C24, I29, P6, CC14		
Poferl, Gerrie	B5, C24, I29, P6, CC14		

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Rakowski, Beverly	B5, C24, I29, P6, CC14	Richardson, Gail and John	C26, C35, T1, T6, T8, T9, T10, T39, T78, AA15, CC1, CC4, CC9
Ramaker, Julianne	B5, C24, I29, P6, CC14	Richter, Pamela	B5, C24, I29, P6, CC14
Randall, E.	C26, C35, T78, AA15, CC1, CC4	Rick, Margie	B5, C24, I29, P6, CC14
Rando-Moon, Jo Anne	B5, C24, I29, P6, CC14	Rickenbach, Deborah	B5, C24, I29, P6, CC14
Ransom, G. Harry	B5, C24, I29, P6, CC14	Riegle, Harold	B5, C24, I29, P6, CC14
Ransom, Jill	B5, C24, I29, P6, CC14	Riley, Kelly	B5, C24, C26, C35, I29, P6, T78, AA15, CC1, CC4, CC14
Rasmussen, David	B5, C24, I29, P6, CC14	Rinaldi, Kathy	C26, C35, T78, AA15, CC1, CC4
Rattman, Jay	G5, T21, T66, CC4	Ringgenberg, Kevin	B5, C24, I29, P6, CC14
Rattman, Joseph	T10, T66, CC4	Rippy, Levi	B5, C24, I29, P6, CC14
Raven, Adam	B5, C24, I29, P6, CC14	Roach, Kenneth	B5, C24, I29, P6, CC14
Rawlings, Jen	B5, C24, I29, P6, CC14	Robbins, Samantha	B5, C24, I29, P6, CC14
Rawson, Therese	G5, T10	Robbins-Smith, Jennifer	B5, C24, I29, P6, CC14
Raynis, ST	B5, C24, I29, P6, CC14	Roberson, Keegan	C26, C35, T78, AA15, CC1, CC4
Redding, Judy	B5, C24, I29, P6, CC14	Roberts, Emerson	B5, C24, I29, P6, CC14
Reed, Dick	B5, C24, I29, P6, CC14	Robertson, Katherine	B5, C24, I29, P6, CC14
Rees, Michael	B5, C24, I29, P6, CC14	Robinson, James and Ellen	T5, T9, T10, T66, CC3, CC9, CC10
Reeves, Sandra	B5, C24, I29, P6, CC14	Robinson, Saliene	B5, C24, I29, P6, CC14
Reich, Andrew	C26, C35, T78, AA15, CC1, CC4	Robison, Roger and Olive	CC3, CC4, CC13
Reichhold, Sharon	C26, C35, T78, AA15, CC1, CC4	Roden, Tessa	B5, C24, I29, P6, CC14
Reilly, Michael	C26, C35, T78, AA15, CC1, CC4	Rodgers, Patricia	T66, T67, CC4
Reinhardt, Karl	C26, C35, T78, AA15, CC1, CC4	Rogers, Lila	B5, C24, I29, P6, CC14
Reith, Paul	C26, C35, T78, AA15, CC1, CC4	Rohrer, Marianne	B5, C24, I29, P6, CC14
Reno, Lavina	B5, C24, I29, P6, CC14	Romano, Nick	B5, C24, I29, P6, CC14
Reuber, Larry	J37, T10	Rorke-Davis, Shawn	B5, C24, I29, P6, CC14
Rex, Teresa	B5, C24, I29, P6, CC14	Roske, Adam	B5, C24, I29, P6, CC14
Reynolds, Jonelle	B5, C24, I29, P6, CC14	Ross Hansen Ranch	T65, V2, V44
Reynolds, Ken	C26, C35, T78, AA15, CC1, CC4	Ross, Aimee	B5, C24, I29, P6, CC14
Rhoades, Martha	B5, C24, I29, P6, CC14	Ross, Daria	B5, C24, I29, P6, CC14
Rhodes, Harriet	B5, C24, I29, P6, CC14	Ross, James/Gina	C26, C35, T78, AA15, CC1, CC4
Rhodes, Louis	C26, C35, T78, AA15, CC1, CC4	Ross, Mary	C26, C35, T78, AA15, CC1, CC4
Rhodes, Steve	T19	Ross, Susan	B5, C24, I29, P6, CC14
Rice, Mel	M16, N38, R24, R27, T4, T10, T12, T41, T54, T65, Y7	Ross-Bryant, Lynn	B5, C24, I29, P6, CC14
Richards, Paul	B4, B5, B6, C14, C24, I29, P6, R22, CC14	Roth, Barbara	P11
Richards, Ron	B5, C24, I29, P6, CC14		

<i>Name</i>	<i>Comment #</i>	<i>Name</i>	<i>Comment #</i>
Roth, Selena	B5, C24, I29, P6, CC14	Schomaker, Carlos	C26, C35, T78, AA15, CC1, CC4
Rouse, Clinton	V1, V4, V70, V79, V80, V81	Schreiber, Cindy	B5, C24, I29, P6, CC14
Rowe, David	B5, C24, I29, P6, CC14	Schroeder, Robbin	B5, C24, I29, P6, CC14
Rubin, Robert	B5, C24, I29, P6, CC14	Schuchart, Marisa	B5, C24, I29, P6, CC14
Ruby, Carol	B5, C24, I29, P6, CC14	Schultz, Erik	C26, C35, T78, AA15, CC1, CC4
Ruiz, Susan	B5, C24, I29, P6, CC14	Schultz, Wm.	B5, C24, I29, P6, CC14
Runnels, Jack	B5, C24, I29, P6, CC14	Schulz, Nancy	B5, C24, I29, P6, CC14
Rupert, Barbara	B5, C24, I29, P6, CC14	Schutte, Ron	C26, C35, T78, AA15, CC1, CC4
Rutkowski, Robert	C26, C35, T78, AA15, CC1, CC4	Schwanbeck, Diane	C26, C35, T78, AA15, CC1, CC4
Ryshavy, Joan	Q8, T66, CC1, CC3, CC4, CC13	Schwering, Catherine	B5, C24, I29, P6, CC14
Sachau, B.	No comment to address.	Scott, John	B5, C24, I29, P6, CC14
Sagal, Patrick	B5, C24, I29, P6, CC14	Scotti, O. Bisogno	C26, C35, T78, AA15, CC1, CC4
Sager, Robert	B5, C24, I29, P6, CC14	Scown, Patricia	C26, C35, T78, AA15, CC1, CC4
Salgado, Liane	C26, C35, T78, AA15, CC1, CC4	Scullion, Jason	B5, C24, I29, P6, CC14
Salter, James	B5, C24, I29, P6, CC14	Seastone, Star	B5, C24, I29, P6, CC14
Salvo, Andrea	B5, C24, I29, P6, CC14	Sechrist, Shelley	C26, C35, T78, AA15, CC1, CC4
Salzman, Jaya	B5, C24, I29, P6, CC14	Secord, Reed	No comment to address.
Samuelson, Val	B5, C24, I29, P6, CC14	Segal, Bob	B5, C24, I29, P6, CC14
Sandine, Bob	C26, C35, T78, AA15, CC1, CC4	Sehorn, Charlene	C26, C35, T78, AA15, CC1, CC4
Santerre, Roger	B5, C24, I29, P6, CC14	Seidel, Peter	B5, C24, I29, P6, CC14
Sanville, Douglas	B5, C24, I29, P6, CC14	Seki, Leslie	B5, C24, I29, P6, CC14
Sarmiento, Ulla	B5, C24, I29, P6, CC14	Seltzer, Robert	C26, C35, T78, AA15, CC1, CC4
Savage, Dorothy	C26, C35, T78, AA15, CC1, CC4	Sennet, Clinton and Eileen	T8, T66, T67, CC1, CC3, CC4
Savi, Riccardo	B5, C24, I29, P6, CC14	Sennhauser, Kelly	C26, C35, T78, AA15, CC1, CC4
Savilonis, Melissa	B5, C24, I29, P6, CC14	Sentz, Linda and Gene	T10, CC9
Sawyer-Williams, Christine	B5, C24, I29, P6, CC14	Serafin, Ania	B5, C24, I29, P6, CC14
Scanlan, Tom	B5, C24, I29, P6, CC14	Shafer, James	B5, C24, I29, P6, CC14
Schaefer, Dieter	B5, C24, I29, P6, CC14	Shafer, William	T10
Schaeffer, Peter	C26, C35, T78, AA15, CC1, CC4	Shannon, Erin	B5, C24, I29, P6, CC14
Schallenberger, Allen	J8, N34, Q3, U14, AA26	Shaw, Richard	B5, C24, I29, P6, CC14
Schemm, George W. and Janet B.	T10, T66, T67, CC3, CC4	Shelton, Brand	B5, C24, I29, P6, CC14
Scheuerlein, Gary	B5, C24, I29, P6, CC14	Sherling, Jeff	B5, C24, I29, P6, CC14
Schmookler, Nathaniel	B5, C24, I29, P6, CC14	Sherman, John	B5, C24, C26, C35, I29, P6, T78, AA15, CC1, CC4, CC14
Schmotzer, Michael	C26, C35, T78, AA15, CC1, CC4		
Schneeberger, Susan	B5, C24, I29, P6, CC14		



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Sherman, Roger	T5, T8, CC1, CC9
Shiple, Benjamin	B5, C24, I29, P6, CC14
Shiple, Betty	B5, C24, I29, P6, CC14
Shirey, Keith	B5, C24, I29, P6, CC14
Shively, Kelly	B5, C24, I29, P6, CC14
Shively, Kim	B5, C24, I29, P6, CC14
Shores, Eric and Ann	G2, J35, L2, L7, T10, T21, T37, T66, T67, CC4, CC13, CC15
Shores, Karen Cheney	G2, J35, L2, L7, T10, T21, T37, T66, T67, CC4, CC13, CC15
Shrewsbury, George	B5, C24, I29, P6, CC14
Shuck, Ray	B5, C24, I29, P6, CC14
Shukla, H.	B5, C24, I29, P6, CC14
Shumate, Charlene	B5, C24, I29, P6, CC14
Siebel, Gonnie	T78, AA15, CC1, CC4
Siefken, Debra	C26, C35, T78, AA15, CC1, CC4
Sierra Club	J1, J15, J33, T9, AA15, AA49, CC5, CC6
Sierra Club Grizzly Bear Project	C8, J1, J15, J33, T9, AA15, AA49, CC5, CC6
Simmons, Pat	B6
Simon, Philip	C26, C35, T78, AA15, CC1, CC4
Simpson, Lois	B5, C24, I29, P6, CC14
Singh, Ashok	B5, C24, I29, P6, CC14
Skelton, Julia	C26, C35, T78, AA15, CC1, CC4
Skinner, R.	C26, C35, T78, AA15, CC1, CC4
Skinner, Tawna	B5, C24, I29, P6, CC14
Skrivanek, Greg	B5, C24, I29, P6, CC14
Skup, Debra	C26, C35, T78, AA15, CC1, CC4
Skyline Sportsmen	B3, G5, M3, M14, N32, Q7, R14, R19, R20, R30, T74, T80, AA67
Slawson, Thomas	B5, C24, I29, P6, CC14
Slevc, Patricia	B5, C24, I29, P6, CC14
Slider, Francis	C26, C35, T78, AA15, CC1, CC4
Smartt, Howard	B5, C24, I29, P6, CC14

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Smeal, Mindy	B5, C24, I29, P6, CC14
Smith, Andrew	C26, C35, T78, AA15, CC1, CC4
Smith, Darrell	V9, V67, V69, V71, V72, V73, V74
Smith, Jamie	C26, C35, T78, AA15, CC1, CC4
Smith, Justin	B5, C24, I29, P6, CC14
Smith, Pat	B5, C24, I29, P6, CC14
Smith, Paul K.	B5, C24, I29, P6, CC14
Smith, Suzanne	B5, C24, I29, P6, CC14
Snow, Edward	B5, C24, I29, P6, CC14
Snowden, Monty	V37
Snowden, Timothy	B5, C24, I29, P6, CC14
Snowline Grazing Association	T10, T65, V2, V12, V63
Sobanski, Sandy	B5, C24, I29, P6, CC14
Soderlind, Johan	B5, C24, I29, P6, CC14
Sohn, Rolf	C26, C35, T78, AA15, CC1, CC4
Solberg, Linda	B5, C24, I29, P6, CC14
Sommer, Dobby	B5, C24, I29, P6, CC14
Soper, Michelle N-McDaniel	B5, C24, I29, P6, CC14
Sorensen, Robert	C26, C35, T78, AA15, CC1, CC4
Sotire, Robin	B5, C24, I29, P6, CC14
Southwestern Montana Stockman's Association	G1, G3, K14, M1, N7, N10, N28, N41, R1, U12, AA24, AA29, AA42
Spear, Todd	B5, C24, I29, P6, CC14
Spears, Nancy	B5, C24, I29, P6, CC14
Speer, Greg	C26, C35, T78, AA15, CC1, CC4
Spencer, Patrick	B5, C24, I29, P6, CC14
Spengler, Eric	C26, C35, T78, AA15, CC1, CC4
Spitz, Marlene T.	B5, C24, I29, P6, CC14
Spotts, Richard	B5, C24, I29, P6, CC14
St. Pierre, Leslie	C26, C35, T78, AA15, CC1, CC4
Stadler, Jody	B5, C24, I29, P6, CC14
Staffanson, Robert	Q8, T66, T67, CC1, CC3, CC4

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Stafford, Evan	B5, C24, I29, P6, CC14	Strebeck, Robert	B5, C24, I29, P6, CC14
Stahl, Tracey	B5, C24, I29, P6, CC14	Stril, Jean	B5, C24, I29, P6, CC14
Stair, Judith	B5, C24, I29, P6, CC14	Strobel, Jeanine	B5, C24, I29, P6, CC14
Staley, Rod	V78	Stucky, Wendy	B5, C24, I29, P6, CC14
Standi, Ilona	B5, C24, I29, P6, CC14	Studebaker, Hilary	B5, C24, I29, P6, CC14
Stanfield, Gary	B5, C24, I29, P6, CC14	Stull, Rita	B5, C24, I29, P6, CC14
Stanford, Leah	T65, V2	Suk, Annie	B5, C24, I29, P6, CC14
Stanley, William	C26, C35, T78, AA15, CC1, CC4	Sullivan, James	B5, C24, I29, P6, CC14
Stark, Jeff	B5, C24, I29, P6, CC14	Sullivan, John B.	I29, P5, CC6
Stash, Matt	Q8, T66, T67, CC3, CC4	Sutton, Russ	T65, V2, V17, V27, V28, V32, V33, V68, V78, V83, V84, V86, V87
Stecker Ranch	T10	Suzuki, Mika	C26, C35, T78, AA15, CC1, CC4
Steinhoff, Keli	B5, C24, I29, P6, CC14	Sventy, Robert	C26, C35, T78, AA15, CC1, CC4
Steinmuller, David	Q8, T8, T10, CC3	Swan, H.	B5, C24, I29, P6, CC14
Stenflo, Jahnvi	B5, C24, I29, P6, CC14	Swanson, John R.	B2, Q14, CC1, CC3
Stepchin, Lorraine	B5, C24, I29, P6, CC14	Sysum, Shirley	B5, C24, I29, P6, CC14
Stern, Jared	B5, C24, I29, P6, CC14	Szendroi, Annamaria	B5, C24, I29, P6, CC14
Stevens, Nike	B5, C24, I29, P6, CC14	Szponer, Fred James	C26, C35, T78, AA15, CC1, CC4
Stewart, Edward	C26, C35, T78, AA15, CC1, CC4	Szydlowski, Marilyn	B5, C24, I29, P6, CC14
Stewart, Marry	C26, C35, T78, AA15, CC1, CC4	Tadder, Mark	B5, C24, I29, P6, CC14
Stewart, Michael	B5, C24, I29, P6, CC14	Tafoya, Shelly	B5, C24, I29, P6, CC14
Still Day, Renee	B5, C24, I29, P6, CC14	Talbot, Edward G.	B5, C24, I29, P6, CC14
Still, Alexandra	B5, C24, I29, P6, CC14	Tan, Frances	B5, C24, I29, P6, X6, CC14
Stitzer, Leigh	B5, C24, I29, P6, CC14	Tassone, Michael	B5, C24, I29, P6, CC14
Stockman, Sharon	C26, C35, T78, AA15, CC1, CC4	Tauscheck, Steve	C26, C35, T78, AA15, CC1, CC4
Stollery, Scott	B5, C24, I29, P6, CC14	Taylor, Phil	B5, C24, I29, P6, CC14
Stone, George	C26, C35, T78, AA15, CC1, CC4	Taylor, Phillip	B5, C24, I29, P6, CC14
Stonebraker, Debra	B5, C24, I29, P6, CC14	Teare, Dan	B5, C24, I29, P6, CC14
Story, Don	V14, V18, V21, V40, V59, V60, V61, V62, V64, V65	Tepper, Carol	B5, C24, I29, P6, CC14
Stout, Clifford	G5, T10, T65, V17, V28, V32, V33, V45, V78, V89, V98, V99, V100, V101, AA24	Thayer, Douglas	B5, C24, I29, P6, CC14
Stout, Nancy	T10, T53, V17, V28, V32, V33, V45, V78, V89, V98, V99, V100, V101	The Ecology Center	B5, C24, I29, P6, CC14
Stout, Wade	T10, V17, V28, V32, V33, V45, V78, V89, V98, V99, V100, V101, AA54	The Lands Council	B5, C24, I29, P6, CC14
Strader, Ellen	C26, C35, T78, AA15, CC1, CC4	The Montana Coalition for Appropriate Management of State Lands	B3, G5, M3, M15, N32, Q7, R14, R19, R20, R30, T74, T80, AA67

<i>Name</i>	<i>Comment #</i>
The Wilderness Society	C2, C4, C9, C11, C12, C13, C18, C24, C26, C27, C28, C29, C30, C31, C32, C33, C34, C35, C42, J21, N12, P6, P11, P12, P13, P14, T8, T10, T15, T41, T63, AA36, AA66, CC9
Thomas, Barbara	B5, C24, I29, P6, CC14
Thomas, Brian	B5, C24, I29, P6, CC14
Thomas, Gary	B5, C24, I29, P6, CC14
Thompson, Susan	B5, C24, I29, P6, CC14
Thraillkill, Gail	B5, C24, I29, P6, CC14
Thraillkill, James	C26, C35, T78, AA15, CC1, CC4
Tidwell, Amy	B5, C24, I29, P6, CC14
Tiffany, Peter	B5, C24, I29, P6, CC14
Tinker, Terry	B5, C24, I29, P6, CC14
Tischhauser, Niki	B5, C24, I29, P6, CC14
Tolfree, Robert	B5, C24, I29, P6, CC14
Tomlinson, Chris	T10, T65, T71, T74
Tomlinson, Kimberlee	T10, T45
Tovey, David	B5, C24, I29, P6, CC14
Towers, TerryAnn	C26, C35, T78, AA15, CC1, CC4
Town of Lima (Jackie Duczek)	V12, V20, V21, V22, V23, V24, V25, V40
Town of Lima (Russ Kluesner)	G5, L1, T10, T52, T65, T74, V2, V17, V18, V19, V36, V41, Y8
Town of Virginia City	T1, V52
Traa, Michael	C26, C35, T78, AA15, CC1, CC4
Tracey, Kayta	B5, C24, I29, P6, CC14
Trafelet, Al	T10
Trainor, Joanna	B5, C24, I29, P6, CC14
Travis, Steve	C26, C35, T78, AA15, CC1, CC4
TreeCrone, Judith	B5, C24, I29, P6, CC14
Trenholm, Christy	B5, C24, I29, P6, CC14
Trevvett, Thomas	B5, C24, I29, P6, CC14
Trine, Mari	B5, C24, I29, P6, CC14
Trolinger, Charlotte	B5, C10, C24, I29, I30, P6, T10, AA36, CC14
Truxel, Bess	B5, C24, I29, P6, CC14

<i>Name</i>	<i>Comment #</i>
Tuber, Jack	B5, C24, I29, P6, CC14
Tucker, Ashlin	B5, C24, I29, P6, CC14
Tucker, Chris	C26, C35, T78, AA15, CC1, CC4
Tupaj, Sydney	B5, C24, I29, P6, CC14
Turbin, Mark	B5, C24, I29, P6, CC14
Turek, Gabriella	C26, C35, T78, AA15, CC1, CC4
Turner, Alice	B5, C24, I29, P6, CC14
Turner, George	B5, C24, I29, P6, CC14
Tyler, Steve	C26, C35, T78, AA15, CC1, CC4
Umbarger, Kathryn	B5, C24, I29, P6, CC14
Umbertino, Josette	B5, C24, I29, P6, CC14
Underwood, William	B5, C24, I29, P6, CC14
Unfried, Juliet	C26, C35, T78, AA15, CC1, CC4
Unruh, Jerry	B5, C24, I29, P6, CC14
USGS (Brenda Johnson)	No comment to address.
Val Cohen, Rachel	T10
Valach, James	G5, T10,
Valenza, Elaine	B5, C24, I29, P6, CC14
Valenzuela, Andrea	C26, C35, T78, AA15, CC1, CC4
van Davis, Barbara	B5, C24, I29, P6, CC14
van Davis, Jeffrey	B5, C24, I29, P6, CC14
Van Doren, John and Debi	B5, C24, I29, P6, CC14
Van Duren, Barbara	B5, C24, I29, P6, CC14
vanAtten, Robin	B5, C24, I29, P6, CC14
Vander Leest, Jana	B5, C24, I29, P6, CC14
Vander Weerd, Jess	B5, C24, I29, P6, CC14
Vanderleelie, Roy	C26, C35, T78, AA15, CC1, CC4
Vandersloot, Jan	B5, C24, I29, P6, CC14
Varricchio, David	T5, T10, CC1
Vasquez, Anita	C26, C35, T78, AA15, CC1, CC4
Vaughan, Stephen	B5, C24, I29, P6, CC14
Verry, James	B5, C24, I29, P6, CC14
Vertrees, Gerald	B5, C24, I29, P6, CC14
Vetrano, Tony	C26, C35, T78, AA15, CC1, CC4
Vickers, James	B5, C24, I29, P6, CC14
Viglia II, Peter	B5, C24, I29, P6, CC14

<i>Name</i>	<i>Comment #</i>	<i>Name</i>	<i>Comment #</i>
Vignere, Joel	B5, C24, C26, C35, I29, P6, T78, AA15, CC1, CC4, CC14	Washington, Taisha	B5, C24, I29, P6, CC14
Villaneuve, Michele	B5, C24, I29, P6, CC14	Wathen, Julia	B5, C24, I29, P6, CC14
Villaume, Danile	B5, C24, C26, C35, I29, P6, T78, AA15, CC1, CC4, CC14	Watrous, Frank	C26, C35, T78, AA15, CC1, CC4
Villavicencio, Alan	B5, C24, C26, C35, I29, P6, T78, AA15, CC1, CC4, CC14	Watters, Benita	B5, C24, I29, P6, CC14
Villavicencio, Dennis	B5, C24, C26, C35, I29, P6, T78, AA15, CC1, CC4, CC14	Wayne, Jerry	B5, C24, I29, P6, CC14
Vinson, John	B5, C24, I29, P6, CC14	Weaver, Victoria	C26, C35, T78, AA15, CC1, CC4
Virginia City Planning and Zoning Boards	C21, C22, C23	Webb, J.C.	C26, C35, T78, AA15, CC1, CC4
Virginia City Horse- women's Society	T1, T10, V52	Webb, Linda	B5, C24, I29, P6, CC14
Vogelbacher, Beverly Swift Pony	B5, C24, I29, P6, CC14	Weber, John and Betty	C26, C35, T78, AA15, CC1, CC4
Vogele, John	B5, C24, I29, P6, CC14	Weber, Marc	B5, C24, I29, P6, CC14
vonHoldt, Diana	B5, C24, I29, P6, CC14	Webster, Margaret	C26, C35, T78, AA15, CC1, CC4
Wagner, Dean	B5, C24, I29, P6, CC14	Webster, Marie	B5, C24, I29, P6, CC14
Wahosi, Mare	B5, C24, I29, P6, CC14	Weigle, Elizabeth	B5, C24, I29, P6, CC14
Waitz, Ronald	B5, C24, I29, P6, CC14	Weiner, Jordan	B5, C24, I29, P6, CC14
Waldorf, Thomas	T10, V17, V75, V78, V89	Weiss, Stuart	B5, C24, I29, P6, CC14
Walker, Betsy	B5, C24, I29, P6, CC14	Welch, Joanna	B5, C24, I29, P6, CC14
Walker, Ira	T10	Wellings, Felicity	B5, C24, I29, P6, CC14
Walker, John	B5, C24, I29, P6, CC14	Weltzien, Alan	C26, C35, T78, AA15, CC1, CC4
Wallace, Gerald	C26, C35, T78, AA15, CC1, CC4	Wen, Frederick	C26, C35, T78, AA15, CC1, CC4
Wallace, Richard	B5, C24, I29, P6, CC14	Wendel, Henry and Jan	B5, C24, I29, P6, CC14
Wallin, Stephen	C26, C35, T78, AA15, CC1, CC4	Wernette, Tim	B5, C24, I29, P6, CC14
Wallrich, Peter	B5, C24, I29, P6, CC14	Western Environmental Trade Association	R27, T10, T72, T73
Walter, Sandrea	B5, C24, I29, P6, CC14	Western Watersheds Project	B5, C12, C13, C19, C20, C46, Q6, Q7, AA18, AA54, AA63, CC6, CC14
Walton, Paulette	C26, C35, T78, AA15, CC1, CC4	Westgaard, Suzanne	B5, C24, I29, P6, CC14
Ward, Patrick	B5, C24, I29, P6, CC14	Whang, Roy	B5, C24, I29, P6, CC14
Ward, Philip	C26, C35, T78, AA15, CC1, CC4	Wheelock, Michael	B5, C24, I29, P6, CC14
Ward, Shirley	C26, C35, T78, AA15, CC1, CC4	White, Dave	B5, C24, I29, P6, CC14
Warner, Barbara	C26, C35, T78, AA15, CC1, CC4	White, Sharol	B5, C24, I29, P6, CC14
Warner, Natacha	B5, C24, I29, P6, CC14	White, Viola	B5, C24, I29, P6, CC14
		Whited, Margaret	C26, C35, T78, AA15, CC1, CC4
		Whitney, Suzanne	C26, C35, T78, AA15, CC1, CC4
		Wiedemann, Janna	B5, C24, I29, P6, CC14



<i>Name</i>	<i>Comment #</i>
Wiget, Francis	B5, C24, I29, P6, CC14
Wilde, Marika	C26, C35, T78, AA15, CC1, CC4
Wilkins, Paul	B5, C24, I29, P6, CC14
Williams, Craig	B5, C24, I29, P6, CC14
Williams, Heather	B5, C24, I29, P6, CC14
Williams, Paul	C26, C35, T78, AA15, CC1, CC4
Williams, Seanna	B5, C24, I29, P6, CC14
Williams, Susan	B5, C24, I29, P6, CC14
Williams, Terese	B5, C24, I29, P6, CC14
Wilson, Katherine	B5, C24, I29, P6, CC14
Wilson, Kim	B5, C24, I29, P6, CC14
Wilson, Laurie	B5, C24, I29, P6, CC14
Wilson, Pamela	B5, C24, I29, P6, CC14
Wilson, William	C26, C35, T78, AA15, CC1, CC4
Winestine, Zachary	T10, T67, CC1, CC3, CC4
Winowiecki, Leigh	B5, C24, I29, P6, CC14
Winters, Nancy	B5, C24, I29, P6, CC14
Wittekind, Ray	B5, C24, I29, P6, CC14
Wittenbreder, Diana	B5, C24, I29, P6, CC14
Wold, Barbara	B5, C24, I29, P6, CC14
Wolf, Peter	B5, C24, I29, P6, CC14
Wolfsong, Jennifer	B5, C24, I29, P6, CC14
Wolter, Susan	C26, C35, T78, AA15, CC1, CC4
Women of the Wild Hiking Club	G5, T10
Wood, James	B5, C24, I29, P6, CC14
Wood, Jesse	B5, C24, I29, P6, CC14
Wood, Sam	B5, C24, I29, P6, CC14
Woodard, Genevieve	B5, C24, I29, P6, CC14
Woodry, Laura	B5, C24, C26, C35, I29, P6, T78, AA15, CC1, CC4, CC14
Woods, Jenna	B5, C24, I29, P6, CC14
Woods, Pattie	B5, C24, I29, P6, CC14
Woodworth, Kerala	B5, C24, I29, P6, CC14
Woolsten, Deanna	B5, C24, I29, P6, CC14
Wootten, Thomas	B5, C24, I29, P6, CC14

<i>Name</i>	<i>Comment #</i>
Woznick, Theodore	B5, C24, I29, P6, CC14
Wright, Jan	B5, C24, I29, P6, CC14
Wuertz, Nicholas	B5, C24, I29, P6, CC14
Wurz, Steve	B5, C24, I29, P6, CC14
Wyatt, Ann	B5, C24, I29, P6, CC14
Wyatt, Jill	B5, C24, I29, P6, CC14
Wyberg, Bryan	C26, C35, T78, AA15, CC1, CC4
Yellow Flower, Anne	B5, C24, I29, P6, CC14
Yenne, Bob	B5, C24, I29, P6, CC14
Young, Chad	B5, C24, I29, P6, CC14
Young, J.	B5, C24, I29, P6, CC14
Young, Janice Ruth	B5, C24, I29, P6, CC14
Young, Jennifer	B5, C24, I29, P6, CC14
Youngson, Patricia	B5, C24, I29, P6, CC14
Zarchin, Paul	B5, C24, I29, P6, CC14
Zehler, Antonia	B5, C24, I29, P6, CC14
Zeleny-Huber, Alycia	B5, C24, I29, P6, CC14
Zellers, Raleigh	B5, C24, I29, P6, CC14
Zellers, Rosemarie	B5, C24, I29, P6, CC14
Zemek, Ruth	No comment to address.
Zieber, Thomas	B5, C24, I29, P6, CC14
Ziegler, John	B5, C24, I29, P6, CC14
Ziegler, Tristan	C26, C35, T78, AA15, CC1, CC4
Zigler, Kelli	B5, C24, I29, P6, CC14
Zilly, Robert	B5, C24, I29, P6, CC14
Zimmerman, Janet	CC20
Zinn, Robert	B5, C24, C26, C35, I29, P6, T78, AA15, CC1, CC4, CC14
Zinnurov, Alexander	C26, C35, T78, AA15, CC1, CC4
Zitzer, Andrew	T10, CC1, CC3, CC4
Zobel, Conrad	B5, C24, I29, P6, CC14
Zohner, Gaylon	F6, G3, H7, H15, I31, N31, T10, U15
Zukoski, E.B.	B5, C24, I29, P6, CC14
Zumwalt, Judy	B5, C24, I29, P6, CC14
Zyzda, Michael	B5, C24, I29, P6, CC14

## COMMENTS AND RESPONSES

Please note that page numbers referenced throughout the *Comment and Response* section refer to page numbers in the Draft RMP/EIS. Page numbers in the Proposed RMP/Final EIS have shifted as information has been added for clarification. Please refer to the Table of Contents at the front of the Proposed RMP/Final EIS to review corresponding sections referenced in the responses.

### AIR QUALITY

- A1** **Comment:** The use of two stroke snowmobiles in areas of poor air dispersion, notably river valleys, can result in air quality concerns. The EPA encourages the use of four stroke engine snowmobiles.  
**Response:** Most BLM lands are not within areas of poor air dispersion such as river valleys. There are no areas of concentrated snowmobile use in Madison or Beaverhead counties on BLM managed public lands.
- A2** **Comment:** We suggest that project level NEPA documents for prescribed fire discuss EPA Interim Air Quality Policy on Wildland and Prescribed Fire.  
**Response:** The BLM has acknowledged the Interim Air Quality Policy of Wildland and Prescribed Fire and that the BLM coordinates and participates with the Montana Idaho Airshed Group (see page 17 of the Draft RMP/EIS). Air Quality is routinely discussed in project level EAs and in burn plans which are products of EAs.
- A3** **Comment:** It would be appropriate to mention in the Air Quality discussions that Standard #4 “Air Quality Meets State Standards” in the Standards for Rangeland Health and Guidelines for Livestock Grazing is found in Appendix G.  
**Response:** Air Quality is addressed on page 17 of the DRMP. The Goal “Meet the National Ambient Air Quality Standards and prevent significant deterioration of air quality” addresses the intent of the comment. The Montana Ambient Air Quality Standards were incorporated in the *Western Montana Standards for Rangeland Health*.
- A4** **Comment:** It would be appropriate to integrate the recent guidance on the PM 2.5 particulate standard into the RMP. Please contact Joe Delwiche in EPA’s Denver Office.  
**Response:** Research into PM 2.5 including discussion with EPA’s Denver contact indicates that P.M. 2.5 is a concern most applicable to wildland and prescribed fire. EPA’s website <http://www.epa.gov/pmdesignations/documents/120/table.htm>, last updated on Friday, August 13th, 2004, provides a table entitled *Comparison of State Recommenda-*

*tions on PM 2.5 to EPA Responses—June 29, 2004.* Montana only reported one county in nonattainment for PM 2.5, Lincoln County, located in the northwest of the state. The environmental concerns associated with PM 2.5 emissions will be addressed through the development and implementation of burn plans and participation with the Montana/Idaho Airshed Group

- A5** **Comment:** The RMP should meet future Regional Haze requirements established by the State and EPA.  
**Response:** The Draft RMP/EIS states repeatedly, including on page 16 that “All management under any of the alternatives would comply with state and Federal regulations, laws, standards, and policies.” We have added the reference to Regional Haze regulations to the *Air Quality* section in Chapter 3.
- A6** **Comment:** BLM should revise the last paragraph on page 18, which indicates that activities that could adversely affect the classification of lands for purposes of Prevention of Significant Deterioration (PSD) would not be authorized. One problem with this approach is that emissions from fires or other activities would not change the PSD classification. Also, the paragraph does not address the National Ambient Air Quality Standards.  
**Response:** Contact with the EPA Air Quality Specialist in Denver resulted in clarification of EPA’s concerns. EPA emphasized the importance of notification of local communities. We have deleted the paragraph of concern. Community notification is required for project level actions through standard coordination procedures.
- A7** **Comment:** We also encourage the BLM to consider issues such as promoting public education and understanding on air quality trade offs between increased use of prescribed fire versus wildfire. Increased public understanding of prescribed fire vs. wildfire air quality trade offs may promote increased public acceptance of and support for prescribed fire to manage vegetation and fire risk  
**Response:** The BLM currently issues press releases regarding prescribed fire projects and makes EAs and EISs available to persons on lists of interested parties. We anticipate awareness activities will increase as environmental documents become available to the public on the Montana/Dakotas BLM internet site.

- A8** **Comment:** It may be helpful to the public and BLM staff to include some basic information in the FEIS regarding how the Smoke Management Plan works to improve public and BLM under-

standing. The last paragraph under Smoke Management and Monitoring (page 154) mentions the Smoke Monitoring Unit but does not explain who they are.

**Response:** A reference to the website for the smoke management unit has been added to the Proposed RMP/Final EIS so persons wanting additional information can find it.

**A9 Comment:** It may be of interest to the public to display the following websites in the FEIS regarding air quality:

- <http://www.smokemu.org> (the Montana/Idaho State Airshed Group)
- <http://www.epa.gov/ttn/oarpg/t1/memoranda/firefnl.pdf> (Interim Air Quality Policy)
- [www.epa.gov/ttn/oarpg/t1/fact\\_sheets/firefl.pdf](http://www.epa.gov/ttn/oarpg/t1/fact_sheets/firefl.pdf) (Fact Sheet).

**Response:** These website references have been added to the *Air* section of Chapter 3 in the Proposed RMP/Final EIS.

## ALTERNATIVES

**B1 Comment:** The RMP fails to provide a reasonable range of alternatives regarding the Tobacco Root Tack-on WSA since under all of the “action” alternatives the 860 acres within that WSA would be released from further wilderness consideration.

**Response:** Alternative A would continue to manage the 860 acres of public land in the Tobacco Root Tack-On WSA under the BLM’s *Interim Management Policy for Lands under Wilderness Review*. This continued management provides a reasonable range for analysis purposes, and impacts from management under Alternative A and Alternatives B, C, and D are described in the *Environmental Consequences* section on pages 300 and 315 of the Draft RMP/EIS, respectively.

**B2 Comment:** We are concerned that the BLM has failed to provide a reasonable range of alternatives when it comes to addressing travel management. The slight changes in miles of route designated open to motorized travel and areas open to snowmobile use are simply a different shade of the same plan and constitute a major shortcoming in the RMP.

**Response:** We believe the four alternatives presented in the plan regarding travel management do encompass a reasonable range. As described in the section of Chapter 2, *Alternatives Considered but Eliminated from Detailed Analysis*, none of the alternatives address extreme approaches to management (for example, having the whole field office open to motorized cross-country use or having the entire field office closed to motorized cross-coun-

try use). In addition, the introductory section of Chapter 2 describes the process used to develop the alternatives. In order for each alternative to allow for some level of support of all resources and uses present in the planning area, alternatives maximizing a particular use at the entire expense of other resources were not analyzed in detail. After the Western Montana RAC recommended Alternative B for inclusion in the plan as BLM’s Preferred Alternative, Alternatives C and D were formulated by the interdisciplinary team and take into account needs of a variety of resource programs.

**B3 Comment:** The planning team should formulate an alternative that maximizes all existing recreational opportunities in the planning area and anticipates and plans for an increase in recreational use in the future. None of the alternatives maximize recreational alternatives and most of them fail to provide adequate recreational opportunity to meet the need. The planning team must formulate at least one alternative that emphasizes Roaded Natural and Semi-Primitive motorized opportunity settings for recreation. This alternative should strive to provide management areas designated for all-terrain/off-highway vehicle routes. The alternative should identify education and service programs that will be provided to users so user conflicts can be avoided and so users can utilize lands suitable for their mode of recreation.

**Response:** As described in the response to Comment B2, the RMP does not include alternatives that maximize certain uses or resources across the planning area. See response to Comment T3 for additional discussion of this comment.

**B4 Comment:** Unfortunately, all alternatives prepared by the BLM continue MASSIVE federal subsidies to private domestic livestock at the expense of the public’s wildlife. Lands available for livestock grazing across the alternatives range from 93% to 95%. This is not a wide range of alternatives. As stated in my comments of March 2003, “PUBLIC lands must be managed for fish and wildlife first. Domestic livestock is the focus of PRIVATE lands. Public lands should never be overgrazed. Domestic livestock must be kept out of public waterways. Domestic livestock grazing is NEVER appropriate in riparian zones and waterways.”

**Response:** The FLPMA mandates that public lands are to be managed for multiple use and sustained yield. These provisions and others are included in the section on *Planning Criteria and Legislative Constraints* in Chapter 1, pages 9 and 10. There is no requirement to manage for fish and wildlife first, though certainly all alternatives considered the protection of fish and wildlife habitat to varying de-

grees. The Draft RMP describes the *Western Montana Standards for Rangeland Health and Guidelines for Livestock Grazing* that BLM uses in regard to the management of livestock grazing in the planning area. In addition, additional provisions regarding management of livestock grazing under Alternative B are described in Chapter 2 on pages 45 and 46.

**B5** **Comment:** Management direction in the Dillon RMP is generally less prescriptive than many land management plans. The management alternatives include goals, desired future conditions, management actions, and allocations, but there appear to be few standards with more binding limitations on land management. We believe management direction would be more protective if prescriptive direction were included. We recommend that the BLM consider development of some additional management direction and prescriptions to provide increased levels of protection, restoration, and enhancement.

**Response:** BLM guidance issued in November 22, 2000 was used in developing this RMP. Resource Management Plans provide a broad framework and set the stage for site specific analysis and permitting requirements, if necessary. BLM believes it is important to maintain flexibility in the land use plan to adapt to new situations and information, as well as to be able to evaluate the appropriateness of prescriptions on a site-specific basis, dependent upon soils, geology, vegetative components, etc. as well as social and economic constraints. However, we have added a section on Best Management Practices (BMPs) (**Appendix Q**) to provide a more comprehensive view of the BMPs that will be considered during site-specific analysis. References to BMPs are still made throughout the plan in their respective sections, but **Appendix Q** lists those currently available that will be considered on a case-by-case basis. However, this list does not limit the BLM to those listed; as new or improved practices are identified, BLM will also consider those during site-specific analysis.

**B6** **Comment:** Despite over 600 pages of text and scores and scores of maps, there has yet to be a wide range of alternatives presented to the public. The public deserves alternatives that protect and enhance watersheds, with specific attention to restoring high-quality westslope cutthroat habitat, sage grouse habitat, and native sage-steppe grasslands. Clearly the time has come for at least one credible “Conservationists’ Alternative.” This Alternative must be prepared to give the public ample opportunity to protect our own public wildlands.

I hereby request that the BLM prepare a

“Supplemental Environmental Impact Statement” to fully consider and evaluate at least one “Conservationists’ Alternative” that would:

- Protect all existing Wilderness Study Areas;
- Protect all existing roadless areas;
- Protect all eligible Areas of Critical Environmental Concern;
- Protect all eligible National Wild and Scenic Rivers; and
- Adopt management tools with strict, mandatory and enforceable standards consistent with conserving and restoring public wildlands, native wildlife habitat, and native fisheries within and connecting to the Dillon Resource Area.

This “Conservationists’ Alternative” will:

- Prioritize public lands management for native fish and wildlife;
- Prohibit private livestock grazing and off-road vehicles in riparian zones and waterways;
- Curtail private livestock grazing wherever it impairs habitat or causes biological harm, such as spreading diseases to public wildlife;
- Curtail oil and gas leasing, mineral development and all other industrialization that might impair public wildlife and public wildlands;
- Consider the restorations of high-quality fisheries and restoration clean, stable watersheds as the highest and best use of public lands;
- Restrict all motorized vehicles to designated system roads only;
- Manage all habitats in the Dillon Resource Area as components of much larger wildland interfaces, including wildlife and plant corridors, as designated by the Yellowstone-to-Yukon Conservation Initiative;
- Control noxious weeds by non-toxic and preventative means by curtailing ORVs, roads, development, and overgrazing - the principle causes of weed invasions;
- Establish a bounty for the removal of noxious weeds that incorporate non-toxic or biological controls;
- Retain all public lands in the public domain; and
- Acquire available lands important to the recovery of threatened, endangered, rare or secluded species that depend on solitude, such as elk, mountain goat, wolverine, fisher, martin and lynx.

We must remember, in the preparation of this “Conservationists’ Alternative” that the needs of domestic livestock grazing, commercial logging, strip or pit mining, oil and gas exploitation, and ORV/snowmobile abuse need to be met on PRIVATE lands, within the PRIVATE sector.

We can no longer afford to subsidize public



wildlands destruction by private interests! Public wildlands, native fisheries and wildlife are diminishing across the landscape to the point of nonexistence. The public supports protecting and enhancing public wildlands' values in the few places where they still remain. Your charge as an agency is to give the public a pro-public-wildlands alternative that they can support.

**Response:** It is BLM's position that the four alternatives presented in the Draft RMP/EIS present a reasonable range of alternatives, including actions that protect and enhance a variety of public land resources. Elements of several of the suggestions in the comment can be found throughout the alternatives; however, none of the alternatives propose exclusive use or protection, as discussed on page 16 of the Draft RMP/EIS.

- B7** **Comment:** MTVRA strongly recommends the BLM develop a true No Action alternative in compliance with NEPA and BLM planning regulations. The BLM must formulate a lawful "No Action" alternative so that the public and decision makers may reasonably compare and contrast other management alternatives. The "Preferred alternative option for travel management" cannot lawfully serve as the No Action alternative required under NEPA, because it is not an accurate baseline with which the public and the decision makers can objectively contrast and compare the proposed action and the other alternatives.

**Response:** The "No Action" alternative in the Draft RMP/EIS is Alternative A. It is indeed an accurate baseline based on the Record of Decision issued in June 2003 for off-highway vehicle travel on BLM lands in the Montana, North Dakota and South Dakota. The "Preferred Alternative" in the Draft RMP/EIS is Alternative B. Alternative A provides the baseline with which the public and the decision makers can objectively contrast and compare the proposed action (Alternative B) and the other alternatives.

## AREAS OF CRITICAL ENVIRONMENTAL CONCERN (ACECS)

- C1** **Comment:** There is no reference to how the five ACECs not designated in the preferred alternative will be managed to protect their identified values. The DEIS merely states, "Management would result in limitations or restrictions placed on other resource uses and activities in order to prevent irreparable damage to the identified values" (p.315). **Response:** The statement in page 315 refers to the management of the designated ACECs and the management restrictions for each is included in the narrative below each ACEC heading on page 315

of the Draft RMP/EIS. The five ACECs not designated would have their relevant and important values protected through the standard management provisions outlined in the description of the Alternative B in Chapter 2. We are including a section in the Proposed RMP/Final EIS in the ACEC section in Chapter 2, Alternative B, which identifies the standard management provisions that would protect the relevant and important values in potential ACECs that are not designated to more clearly display this information.

- C2** **Comment:** In the preferred alternative, Alternative B, the dRMP suggests that standard management is sufficient to protect the identified relevant and important values in five of the proposed ACECs: Big Sheep Creek Basin, Centennial Valley Wetlands, Ferruginous Hawk Nesting Area, Lewis and Clark Trail, and Westslope Cutthroat Trout Habitat. The relevant and important values represented by these five proposed ACECs include wetland habitats; sensitive plant species; peregrine falcon, trumpeter swan and other migratory bird habitat; paleontological resources; highly sensitive ferruginous hawk nests and habitat; historic resources, and vulnerable native trout habitat and populations. The dRMP completely ignores the contradiction between the BLM's responsibility to protect those values and the BLM's intention, stated on pages 48 and 45 of the dRMP, to open nearly the entire resource area to oil and gas development (89%) and grazing (94.5%) under Alternative B. The dRMP fails to evaluate or identify possible impacts to relevant and important values that would thereby result. Can you provide this effects analysis?

**Response:** We did not identify any impacts to the relevant and important values in the five proposed ACECs that would not be designated in Alternative B because we did not feel that there would be any. Stipulations applied to oil and gas leases, grazing, travel management and other uses in Alternative B provide protection of the relevant and important values in these areas. In consideration of our multiple use mandate, the BLM does not apply restrictions on uses that exceed that needed to protect other resources and values.

- C3** **Comment:** In the Westslope Cutthroat Trout Habitat ACEC, management improvements will increase woody debris and protect spawning areas. How do Alternatives B and C cover this same management direction?

**Response:** The management direction for the other alternatives is described on page 20 of the Draft RMP/EIS.



**C4** **Comment:** We are disturbed by the lack of “importance” given to wildlife species and habitat as indicated by the failure to move ACEC nominations for wildlife forward, especially for bighorn sheep and sage grouse.

**Response:** We recognize the importance of wildlife species habitat and both bighorn sheep and sage grouse are considered priority species in the Dillon Draft RMP/EIS. We did determine that the habitat for these species in the Dillon Field Office area met the relevance criteria as wildlife resources but did not meet the importance criteria outlined in the guidance for evaluating nominations for Areas of Critical Environmental Concern. After careful review of the information on these habitats, we found that they are not more than locally significant nor do they have qualities that give these habitats special worth, consequence, meaning distinctiveness or cause for concern, especially when compared to similar resources in the area or region. We also determined that the habitats in general did not have qualities that make them fragile, sensitive, rare, irreplaceable, exemplary, unique, endangered, threatened, or vulnerable to adverse change.

**C5** **Comment:** Are Alternatives C and D switched?

**Response:** No, Alternatives C and D are not switched for ACEC designation in the Draft RMP/EIS. The standard management prescribed in Alternative C provides a higher level of protection to the relevant and important values in the potential ACECs, so no special management is needed in most of the potential ACECs in this alternative.

**C6** **Comment:** We suggest that the Barton Gulch site near Ruby Reservoir and the Trudeau Warm Spring area be acquired and considered for ACEC designation.

**Response:** FLPMA only provides for the designation and protection of public lands as ACECs. Any consideration of ACEC designation for the lands listed in the comment would have to follow the completion of an acquisition.

**C7** **Comment:** The continued authorization of domestic sheep allotments on Blacktail Ridge, the Gravellys, and the Sheep Experiment Station precludes any opportunity to reestablish wild sheep on these landscapes, all historic wild sheep range. BLM has the opportunity to mitigate this by extending ACEC protections for the Tendoys and Melrose/Maidenrock where BLM’s own guidelines for sheep habitat would adequately provide the standards and guidelines to protect and expand these Bighorn sheep herds.

**Response:** The BLM does not currently authorize any domestic sheep in the Gravellys or in the Cen-

tenial Mountains. Any sheep use authorized in these areas is under the administration of agencies other than the BLM. The BLM does authorize domestic sheep on one allotment in the Blacktail Ridge area.

Determining the viability of reintroduction areas for bighorn sheep is the responsibility of the Montana Fish Wildlife and Parks. The BLM has worked closely with FWP on the reintroduction of bighorn sheep in three areas in the Dillon Field Office in the past and will continue to do so in the future. The Bureau guidelines for management of domestic sheep and goats, as outlined in IM 98-140, are applicable where bighorn sheep are reintroduced or where they currently occupy habitat on public lands. The compliance with Bureau policy is described on page 16 of the Draft RMP/EIS and the specific policies related to wildlife management are listed on page 162.

We did determine that the Tendoys and Melrose/Maidenrock Bighorn Sheep areas did not meet the importance criteria for potential ACEC, but bighorn sheep are a priority species that we manage habitat for. We feel that the standard management provisions in the preferred alternative provide adequate protection for bighorn sheep habitats.

**C8** **Comment:** We recognize that the BLM did propose eight ACECs for designation in the preferred alternative, but failed to propose five others which the agency found qualified for the designation.

**Response:** The Bureau guidance on designating ACECs states that the designation of an ACEC is based on whether or not a potential ACEC requires special management attention in the selected plan in order to protect the relevant and important values of the potential ACEC. As stated on page 314 of the Draft RMP/EIS, the management identified under the standard provisions outlined in the preferred alternative would provide protection of the relevant and important values of the five potential ACECs that would not be designated under this alternative. Since no “special management” is needed, the areas would not be designated under the preferred alternative. We are including a section in the Proposed RMP/Final EIS in the ACEC section in Chapter 2, Alternative B, which identifies the standard management provisions that would protect the relevant and important values in potential ACECs that are not designated to more clearly display this information.

**C9** **Comment:** Prior to the issuance of the DRMP/EIS, a subgroup (BLM/RAC) reduced 63 nominations for potential ACEC designation down to only 14. We maintain that the DFO must revisit and take a

hard look at the 63 ACEC nominations during the DRMP/EIS analysis process. A “hard look” is required. It is highly arbitrary and capricious for the BLM managers to delay ACEC designation for 24 years and then to just re-offer 13 as the only current ACECs considered in this DRMP/EIS.

**Response:** The process used to review ACEC nominations is described on pages 4 and 5 of the November 2002 document titled “Relevance and Importance Evaluations of Area of Critical Environmental Concern Nominations” prepared by the Dillon Field Office. Recommendations made by both the BLM Resource Advisory Council and the BLM review team along with the documentation of the review, were carefully reviewed by the Dillon Field Manager along with the information provided by the nominator(s), additional information gathered by BLM specialists and any other available information. The determinations on which nominations met the relevance and importance criteria were made by the Field Manager following this careful review.

**C10 Comment:** All ACECs should be withdrawn from mineral entry and leasing and off-road vehicle use prohibited.

**Response:** The special management prescribed for each designated ACEC is designed to protect the specific relevant and important values that were identified for the ACEC. We felt that the restrictions placed on mineral development and exploration that are described under the special management shown on pages 64-66 of the Draft RMP/EIS in addition to the standard management provisions for the alternative were adequate to protect the relevant and important values in the ACECs. (Note that standard management across all alternatives prohibits off-road vehicle use on BLM lands in the planning area with minor exceptions). In consideration of our multiple use mandate, the BLM does not apply restrictions on uses that exceed that needed to protect other resources and values.

**C11 Comment:** Under the preferred alternative of the RMP, no ACEC would be designated for westslope cutthroat trout. In 1999 the BLM signed an MOU and Conservation Agreement in Montana for westslope cutthroat trout (WCT), a species which the agency considers a Species of Special Concern (MOU 1999). The management goal and objectives of the WCT MOU is to protect existing populations and ensure the long-term persistence of WCT within their historic range in Montana. The westslope cutthroat trout ACEC nomination says that according to intensive inventories and genetic analyses, 37 pure populations of WCT occur in the DFO, and that many of these populations are iso-

lated, small, and vulnerable to extinction. The nomination further states that historic land use practices have significantly reduced habitat suitability throughout much of this species range, particularly east of the Continental Divide. The types of land use activities that might occur on BLM lands that are documented to impact WCT habitat quality include road building and maintenance, mining, prescribed fire, timber harvest, OHV management, and livestock grazing. Clearly there is compelling evidence supporting relevance, importance, and need for the management change criteria required to advance the WCT ACEC nomination.

**Response:** The ACEC nomination for westslope cutthroat trout habitats was found to meet the relevance and importance criteria and it was advanced as a potential ACEC. Continued implementation of the Memorandum of Understanding and Conservation Agreement for Westslope Cutthroat Trout would protect the relevant and important values of this nomination through standard management. Thus, there is no need to designate this nomination and potential ACEC as an ACEC.

**C12 Comment:** The actions outlined in the proposed WCT ACEC are inadequate because:

1. Only fragmented pieces of the streams are targeted for special management.
2. The WCT ACEC is only shown as designated in one alternative, alternative D.
3. The special management provisions in alternative D do not include restrictions on road building and maintenance, mining, prescribed fire, timber harvest, off highway vehicle use or livestock grazing.

**Response:**

1. FLPMA only provides for the designation and protection of public lands as ACECs. Any consideration of ACEC designation for stream segments that are not in public ownership is not allowed. This may appear to implement management in a fragmented manner. However, we are committed to work cooperatively with other land owners and management agencies to provide consistent management where possible as outlined in the Memorandum of Understanding and Conservation Agreement for Westslope Cutthroat Trout.
2. The BLM has determined that the standard management provisions in the preferred alternative including implementation of the Memorandum of Understanding and Conservation Agreement for Westslope Cutthroat Trout would protect the relevant and important values of this nomination. There would be no need to designate this nomination as an ACEC in this case.

3. In alternative D, a plan of operations would be required before any mining operations could take place within the WCT ACEC and this plan would have to include provisions to protect the relevant and important values in the ACEC. The best management practices for road building and maintenance and timber harvest would provide protection of the values from impacts of these activities in this alternative.

**C13** **Comment:** General management provisions outlined in the dRMP on page 19 of Appendix K are also insufficient and will not protect the few remaining genetically pure WCT populations found in the DFO. The BLM should go back to the drawing board and propose a comprehensive restoration initiative that will ensure the survival and future thriving populations of this declining species of trout. Any comprehensive initiative must:

- Designate all critical core areas as well as important connective habitat for WCT as an ACEC in the final plan.
- Ensure that grazing management and other land uses are modified or eliminated within the ACEC so that riparian and channel conditions are on a measurable upward trend within five years (the dRMP proposes doing this within fifteen years).
- Withdraw streams and floodplains in the ACEC from mineral location and leasing.
- Prohibit ORV use in streams and riparian areas within the ACEC.

**Response:** The conservation actions for westslope cutthroat trout (WCT) are outlined on page 19 of **Appendix D** in Volume II of the Draft RMP/EIS. These actions were taken from the Memorandum of Understanding and Conservation Agreement for Westslope Cutthroat Trout that was developed cooperatively with input from fishery biologists from other state and federal agencies and the involvement of federal and state land and wildlife management agencies, conservation groups, industry representatives and tribal representatives. The conservation goals and actions incorporated into the DRMP were taken from this agreement and are based on the best current scientific thought on WCT conservation. We feel that the standard management actions prescribed in the preferred alternative along with the conservation actions for WCT would provide adequate protection for WCT habitats. Grazing would be managed so the standards for rangeland health, including riparian health and habitat for special status species such as WCT would be met. In addition, special emphasis would be applied to protect important spawning habitats of pure populations of WCT. Mineral development

in or adjacent to WCT streams would be managed to protect and restore habitats during and after activities. Off-road vehicle use is not allowed under any of the alternatives.

**C14** **Comment:** Monitoring should be conducted in all ACECs for the particular values that are being protected.

**Response:** Monitoring will be outlined in the Approved Plan for designated ACECs as well as for other resource programs.

**C15** **Comment:** We are especially excited about the Centennial Mountains ACEC, which will help promote wildlife linkage. Management for this ACEC includes, "No new permanent roads would be allowed in the area to maintain current unfragmented habitat for wildlife migration." How is it covered in Alternative C? I could find no language in the travel management section that gave similar guidance.

**Response:** Pages 25 and 26 of the Draft RMP/EIS include the management actions that would be implemented under Alternative C to maintain and/or enhance the effectiveness of wildlife migration/dispersal corridors, including the Centennial Mountains. These actions include the evaluation of projects, including new roads, to determine if the project may limit the effectiveness of these corridors.

**C16** **Comment:** ACECs will be designated if special management is required to protect its relevant and important values. "Management is considered special if it is outside of the ordinary or routine requirements of the BLM or if it is not covered by provisions already stipulated in the RMP" (page 7). The DEIS fails to account for the value of ACEC designation. Although similar management may be included for these areas in certain alternatives, the ACEC designation communicates something important to the public. Since many of the management prescriptions for ACECs listed on page 64-65 are discretionary, the designation helps justify decisions to both BLM managers and to the public.

**Response:** ACECs should highlight areas where special management is needed to protect and prevent irreparable damage to relevant and important resources or to protect human life and safety from natural hazards. ACEC designation is not meant to simply highlight values that are important or of interest if "special management" is not needed to protect these values. BLM's guidance on analyzing the effects of ACEC management states that "Designation of an ACEC will not produce effects that can be analyzed. However, the management

prescriptions for the ACEC (i.e. the special management attention) will result in effects.” We have completed our analysis in the manner outlined in our guidance. Potential ACECs that are not proposed for designation would have their relevant and important values protected through standard management provisions in the alternative. This will provide protection and enhancement of these values not only in the areas within the nomination, but, in many cases, throughout the planning area where the values exist. No additional justification should be needed to implement the management since it is a standard provision in the plan.

**C17 Comment:** Through a subgroup of the Western Montana Resource Advisory Committee (RAC) NWF staff were deeply involved with evaluating the nominations for ACEC. The RAC-designated subgroup could not come to consensus on a number of very strong nominations, some of which came internally from your own staff. Several no-consensus nominations were passed without prejudice from the subgroup to the BLM for you to make balanced findings and determinations, but no such balance is apparent. For example, most of the ACECs that are described, such as those for bighorn sheep, westslope cutthroat trout and ferruginous hawks, are not placed in the preferred alternative. Other nominated ACECs, such as those for sage-grouse and the Sagebrush Creek areas were dismissed, in our opinion arbitrarily, through findings that the nomination did not meet the “importance” criteria as reported (but not justified) in a previous planning document (BLM 2002). By these repeated instances where the BLM either entirely rejected the nomination by what appears to be an arbitrary decision, or named the nominated area a “potential” ACEC then failed to place it in the preferred alternative, the BLM has avoided the ACEC designation process. We continue to be perplexed and concerned about the BLM’s perspective on the lack of “importance” of various wildlife and habitat resources. Perhaps this is a function in part of not adequately consulting with resource professionals either within or outside BLM for other perspectives and information. We are confident that if such consultation had occurred, there would be more broad recognition of the “importance” of various wildlife populations in the DFO. This discrepancy was most directly illustrated in a discussion of bighorn sheep and sage grouse, but certainly could be extended to westslope cutthroat trout, ferruginous hawk, trumpeter swans, grizzly bear, lynx, wolf, and others. The record does not indicate that the BLM consulted with the USFWS, FWP, Montana Natural Heritage Program, academics or other authorities while preparing its findings on the “im-

portance” criteria for the species emphasized in the ACEC nominations. The record does indicate that the BLM disregarded its own professional staff opinion in finding these nominations did not meet the “importance” criteria. The BLM may have violated its own planning regulations by this pattern of skewed and shallow analysis, leading to flawed findings and alternative construction.

**Response:** The process used to review ACEC nominations is described on pages 4 and 5 of the November 2002 document, “Relevance and Importance Evaluations of Area of Critical Environmental Concern Nominations” prepared by the Dillon Field Office. Recommendations made by both the BLM Resource Advisory Council and the BLM interdisciplinary review team along with the documentation of the review, were carefully reviewed by the Dillon Field Manager along with the information provided by the nominator(s), additional information gathered by BLM specialists and any other available information including but not limited to information from the USFWS, FWP and the Montana Natural Heritage Program. Nominators, both internal and external were asked to provide additional information to support the nominations in many cases. If the BLM interdisciplinary team or the RAC subgroup could not come to a consensus agreement of the relevance and importance of a nominated area, the Field Manager made the determinations on which nominations met the relevance and importance criteria following this careful review. Where consensus recommendations were made, the Dillon Field Manager adopted the recommendations in all but one instance. This does not constitute a skewed analysis and certainly was not a violation of the BLM’s regulations or guidance on evaluating nominations for potential ACECs.

**C18 Comment:** The BLM does not appear to have consulted with the USFWS, the FWP, the Montana Natural Heritage Program; scientists and academics with expertise in pertinent issues related to the values for which ACECs were proposed, or any other authorities during the decision making process.

**Response:** Information from all of the sources listed by the commenter was often used to develop ACEC nominations submitted both by the public and by BLM staff and a review of the nominations shows information from a number of other non-BLM sources was included in ACEC nominations. Nominations developed by BLM staff were part of the analysis of the management situation, which involved extensive coordination between the individual specialists and their counterparts in other agencies, Universities, research organizations, etc.



In addition, when it appeared information was still lacking on ACEC nominations submitted by the public, BLM staff was tasked with gathering additional information. In addition, as the Western Montana RAC assisted with the review of whether nominations met the relevance and importance criteria, BLM staff was available to the subgroup to provide information or clarification regarding the nominations. The RAC subgroup was also given the option of requesting additional information or expertise if they felt it necessary to inform themselves regarding the nomination.

- C19 Comment:** The entire Dillon Resource Area encompasses a variety of crucial fish and wildlife habitats that warrant designation of the entire resource area as an ACEC. However, this nomination was thrown out because the nomination was considered “too broad” (page 15, BLM Relevance and Importance Evaluations of ACEC Nominations, Nov. 2002). In fact, the Dillon Resource Area is not broad enough to encompass all the seasonal habitat needs for imperiled native species dependent on the area for survival such as bighorn sheep, sage grouse, westslope cutthroat trout and fluvial arctic grayling. The Dillon Resource Area is a national fish and wildlife treasure that deserves special management considerations to recover, conserve and manage these and other native species. ACEC designation for the entire resource area is both important and relevant to the survival of these species in the region.

**Response:** We did not mean that the area nominated was “too broad” but that the nomination was too broad to allow us to even analyze relevance and importance. We do believe that the public lands administered by the Dillon Field Office provide important habitat for wildlife species and feel that the preferred alternative in the draft plan addresses the importance of these habitats. The habitats for several of the species that are specifically mentioned in this comment were evaluated in other ACEC nominations and special status and priority species habitats are addressed throughout the draft plan.

- C20 Comment:** A watershed level approach to native fish recovery, conservation and management will be necessary to reverse current trends for both westslope cutthroat trout and fluvial arctic grayling. I suggest the entire Clark Canyon watershed above Clark Canyon reservoir be designated the Clark Canyon Watershed ACEC to prioritize native fish recovery, conservation and special management within the basin.

**Response:** The conservation actions for westslope cutthroat trout (WCT) are outlined on page 19 of

**Appendix D**, Volume II of the Draft RMP/EIS and the implementation of this agreement and the Montana Fluvial Arctic Grayling Restoration Plan are management common to all alternatives. These plans were developed cooperatively with input from fishery biologists from other state and federal agencies and the involvement of federal and state land and wildlife management agencies, conservation groups, industry representatives and tribal representatives. The conservation goals and actions incorporated into the DRMP were taken from these plans and are based on the best current scientific thought on WCT and grayling conservation. We feel that the standard management actions prescribed in the preferred alternative along with the conservation actions for WCT and grayling would provide adequate protection for their habitats and also provide the best opportunity to apply consistent management to all habitats regardless of ownership.

The nomination of the Clark Canyon Watershed ACEC was submitted on August 26, 2002. Nominations received after August 15, 2002 were not considered in this planning process. However, grayling and westslope cutthroat trout issues are discussed throughout the draft plan.

- C21 Comment:** While we are pleased that the BLM has identified a 340 acre parcel of BLM land immediately to the south of the city as worthy of designation as an Area of Critical Environmental Concern (ACEC), we feel the designation does not go far enough in scope or in area. Management would remove 340 acres from mineral entry limiting new mineral exploration and development. We strongly recommend that the scope of the “Special Designation” be expanded to include the following:

- Protect the watershed qualities of the land and facilitate noxious weed control by allowing no additional roads or off-road motorized travel.
- Provide for no transfer of BLM land ownership to private parties.

**Response:** The Virginia City Historic District ACEC was nominated to protect the viewshed and historic values within the boundaries of the designated Virginia City National Historic Landmark. As a result of a mapping error, the correct BLM acreage included in the ACEC proposal is 513 acres rather than 340 acres. Expanding the ACEC boundaries to encompass the entirety of the associated watershed goes beyond what would be required to protect the historical and viewshed values within the designated National Historic Landmark.

Standard management in Alternative B addresses the concerns raised in the comment. Motorized travel is restricted to designated routes and travel management provisions address how and



when newly constructed roads would be considered. BLM lands within the Source Water Protection Area are allocated to either Category I or II for land adjustment, both categories being managed for retention.

- C22** **Comment:** We strongly recommend that the 340 acres be expanded to the east and south as far as possible to encompass a greater area of the Virginia City watershed. We refer you to the October 2000 Town of Virginia City Watershed Protection Plan, PWSID#00353 which delineates the large water recharge area for Virginia City, much of which extends into BLM land.

**Response:** (1310) We reviewed the Town of Virginia City PWS Source Water Protection Plan (PWSID #00353) in April 2002. In particular, the section on Recharge Region management on pages 13 and 14 did not disclose any management actions necessary beyond current regulatory controls. While the report did identify livestock grazing and mining activities as the most predominant factors to consider in the recharge area, they were not identified as threats to the watershed. Since no special management would be needed, designation of the expanded ACEC for the Virginia City watershed was not deemed appropriate.

- C23** **Comment:** We note that the “Virginia City Historic District” ACEC is only included in your Alternatives B and D.

**Response:** The Bureau guidance on designating ACECs states that the designation of an ACEC is based on whether or not a potential ACEC requires special management attention in the selected plan in order to protect the relevant and important values of the potential ACEC. As stated on page 328 of the Draft RMP/EIS, the management identified under the standard provisions outlined in alternative C would provide protection of the relevant and important values of the Virginia City ACEC. Since no “special management” is needed, the area would not be designated under alternative C. Alternative A is the continuation of current management, so no ACECs would be designated in this alternative.

- C24** **Comment:** Designation of ACECs is meaningless without sensitive management and the provisions currently proposed are inadequate. Please develop management provisions for each ACEC that will preserve the values for which it was designated. None exist now. At a minimum, each ACEC should be withdrawn from mineral entry and leasing and off-road vehicle use and access carefully managed.
- Response:** The special management prescribed for each designated ACEC is designed to protect the specific relevant and important values that were

identified for the ACEC. The special management prescribed for each designated ACEC is shown on pages 64-66 of the Draft RMP/EIS. In addition, the standard management provisions for each alternative would also apply and provide additional protection of the relevant and important values in the ACECs. In consideration of our multiple use mandate, the BLM does not apply restrictions on uses that exceed that needed to protect other resources and values.

- C25** **Comment:** Muddy Creek/Big Sheep Creek proposed ACEC. The primary values of this area are directly tied to groundwater hydrology. Special management guidelines should protect groundwater. These could include restricted season of grazing to reduce soil compaction and perhaps more restrictive grazing guidelines to reduce erosion in the adjacent uplands. Restoration of willows and beavers may be appropriate in some areas.

**Response:** As reported in the November 2002 document, “Relevance and Importance Evaluations of Area of Critical Environmental Concern Nominations” prepared by the Dillon Field Office, the Muddy Creek/Big Sheep Creek ACEC was found to meet the relevance and importance criteria for cultural and scenic values. The portion of the nomination for cultural and scenic values was carried forward as the ACEC nomination. These values are not primarily related to groundwater hydrology. See the response to Comment C43 regarding the Big Sheep Creek Basin ACEC nomination for riparian and wetland values.

- C26** **Comment:** Please reconsider the nomination of the Sagebrush Creek ACEC. The rejected Sagebrush Creek ACEC is a remarkable, intact example of sagebrush ecotype complete with a balanced, functioning ecosystem for several sage dependent species—sage grouse, sage thrasher, sage sparrow, and pygmy rabbit – and totally on public land. Critical yearlong sage grouse habitat alone is a significant enough reason to satisfy relevance, importance, and need for special management. BLM has made commitments to the Montana Sage Grouse Plan and could fulfill their obligation in an important way by protecting this superior example of sage habitat.

We find BLM’s rejection of this ACEC fundamentally flawed and very short-sighted. BLM’s own November 2002 ACEC report “Relevance and Importance Evaluations of Dillon RMP ACEC Nominations” describes the nomination in glowing terms. “This area provides major winter and yearlong habitat for large numbers of antelope, mule deer, elk, five BLM sensitive species, and numerous Sagebrush dependent birds and mam-

mals.” ~Pg. 27-28. Some examples of these values can be found elsewhere in the DFO area, yet nowhere, by BLM’s own evaluation, do all factors come together in such a prominent manner. MWF believes that reconsidering the Sagebrush Creek ACEC is appropriate and furthermore considers it a giant step towards securing Sage grouse on the Montana landscape.

**Response:** All of the information provided in this comment was considered in our evaluation of the relevance and importance of this nomination and we did find that the nomination met the relevance criteria. The values identified in this nomination do occur in other locations within the planning area and in the region. We determined that the values identified were not more than locally significant and no additional or new information was provided by the commenter other than that already evaluated that would change the determination on the importance criteria. Conservation actions for sage grouse (see **Appendix D**) are part of standard management in the Proposed Action (Alternative B). As a result, standard management will adequately protect sage grouse and negate the need for a sage grouse ACEC.

- C27** **Comment:** The acceptance of the Centennial Mountains ACEC is a positive step but a decided lack of protection exists. Despite the area’s “outstanding scenic and recreational values... habitat for threatened and endangered species and [significance as] a wildlife linkage [facilitating] wildlife migration and movement between high security habitats” as quoted from the report, would be best served with additional withdrawal from mineral location and leasing. MWF believes a revision of this protection is appropriate and vital to thoroughly protect the area from future activities.
- Response:** Over 27,000 acres of the total 40,715 acres in the Centennial Mountains ACEC are within the Centennial Mountains WSA. In addition to the special management identified on page 64 and 65, most of this proposed ACEC is not available for mineral leasing and the remaining areas are protected by a no surface occupancy or timing stipulation that would protect the relevant and important values in the ACEC. The BLM is required by manual and handbook to use the least restrictive stipulations to meet resource protection objectives. We are directed not to make a discretionary no leasing decision except in the case where there is no way that impacts from oil and gas development can be mitigated. Based on our analysis of all alternatives we feel that impacts from oil and gas leasing and development in these areas could be mitigated by stipulations identified in the Draft RMP/EIS to protect resource values.

If this area is designated an ACEC, plans of operation are required before any locatable minerals are developed. This plan of operations must include mitigation and design features that will protect the values in the ACEC. We feel that this management provides adequate protection of the relevant and important values in the Centennial Mountains ACEC.

- C28** **Comment:** The proposed Tendoy-Melrose/Maiden Rock Bighorn Sheep ACEC should be reconsidered. Rejected as lacking “importance”, we believe this was an incorrect conclusion. Given ACEC protection, bighorn sheep would be given the very impetus needed to begin to repopulate the area and provide for possible future hunting opportunities as well wildlife watching opportunities. TWS encourages the BLM to designate the combined Melrose-Maiden Rock and Tendoy Bighorn Sheep ACEC nomination as an ACEC in the final Dillon RMP, and to consult with Montana Fish, Wildlife and Parks (FWP) to determine specific special management needs.

**Response:** These nominations were determined to have met the relevance criteria as ACECs but failed to meet the importance criteria because there were no circumstances or qualities that made them more than locally significant when compared to the habitats of other populations of bighorn sheep in the region. Although we did determine that the Tendoy and Melrose/Maidenrock Bighorn Sheep areas did not meet the importance criteria for potential ACEC, bighorn sheep are a priority species that we manage habitat for. We feel that the standard management provisions in the preferred alternative provide adequate protection for bighorn sheep habitats. This management includes the application of Bureau guidelines for management of domestic sheep and goats, as outlined in IM 98-140, where bighorn sheep are reintroduced or where they currently occupy habitat on public lands. The compliance with Bureau policy is described on page 16 of the RMP and the specific policies related to wildlife management are listed on page 162.

The BLM has worked closely with FWP on the reintroduction of bighorn sheep in three areas in the Dillon Field Office in the past and will continue to do so in the future. We also coordinate with FWP to insure that current and proposed management is compatible with bighorn sheep habitat needs.

- C29** **Comment:** The management prescriptions outlined in the dRMP for designated ACECs are woefully inadequate. For example, all mineral uses and other uses such as livestock grazing would be permitted in the Block Mountain ACEC (dRMP, page

64), including mineral leasing and location. Impacts from these activities to the area's significant geologic features are not considered at all (dRMP, page 315), despite the BLM's own admission that "the values could be lost if...major site disturbances occur" (ACEC Report, page 11).

**Response:** The relevant and important values in the Block Mountain area are the geologic structures that are exposed in this area. The threats to this value are primarily loss of access for educational and scientific study and any major development that may obstruct or destroy the features. Most uses such as livestock grazing would have no impact on these values. The special management prescribed would continue to make this site available for scientific study and allow for the modification of any proposed surface disturbing activities that would interfere with the ability to view and study the geologic features. We feel that these management prescriptions are adequate to accomplish this level of protection.

**C30** **Comment:** The Blue Lake ACEC is not removed from mineral leasing or location (dRMP, page 64), despite the sensitive nature of unique axolotl salamander population supported by the lake. A no surface occupancy stipulation would be required, but the dRMP includes no analysis of potential groundwater impacts or other negative impacts associated with mineral extraction (dRMP, page 315).

**Response:** The primary threats identified to the relevant and important values in the Blue Lake ACEC are those actions that would add nutrients to the lake or cause warming of the waters in the lake. The lake is fed primarily by surface runoff and our staff specialists did not feel that groundwater played a significant role in maintaining the values in Blue Lake. Actions that would cause surface disturbance and allow sediment or nutrients to enter that lake from surface flows would not be allowed. Any locatable mineral development would be allowed only if the required plan of operations included sufficient mitigation to ensure that the values were protected.

**C31** **Comment:** The dRMP proposes forbidding new "permanent" roads in the Centennial Mountains ACEC, but does not explain what a "non-permanent" road is, or what the impacts of allowing such routes might be (dRMP, page 315).

**Response:** Types of new roads are described on pages 21 and 58 of the Draft RMP/EIS. Non-permanent roads in Alternative B are generally roads that are developed for access to new activities such as timber sales and mineral development rather than routes added to the system for long-term public

access. These roads could be left open as permanent roads only if an equal mileage of existing road is closed.

**C32** **Comment:** Mineral location, leasing and development would be permitted within the Centennial Sandhills ACEC (dRMP, page 65), despite the BLM's conclusion that "loss of sand dune activity could put [special status plant species] at risk" (ACEC Report, page 13).

**Response:** Disturbance is needed to keep sand dunes active. The activities would not be incompatible with the relevant and important values identified for the Centennial Sandhills as long as the special status plant and animal species are protected. If this area is designated an ACEC, a plan of operations would be required before any locatable minerals are developed. This plan of operations must include mitigation and design features that will protect the values in the ACEC. Even though the area would be available for leasing, standard management provisions include a No Surface Occupancy stipulation to protect special status plant species.

**C33** **Comment:** Only 2160 acres within the 8608 acre Everson Creek ACEC would be withdrawn from locatable mineral entry, despite the existence of cultural resources described in the draft RMP as "extremely fragile and susceptible to damage" (ACEC Report, page 17).

**Response:** The 2160 acres proposed for mineral withdrawal are areas that contain cultural materials that would be susceptible to direct damage from mineral development activity. If this area is designated an ACEC, plans of operation would be required before any locatable minerals are developed in areas not withdrawn from mineral entry. This plan of operations must include mitigation and design features that will protect the values in the ACEC that could be affected by development while still allowing mineral development to take place.

**C34** **Comment:** Only 13,097 acres of the 22,829 acre Muddy Creek/Big Sheep Creek proposed ACEC would be designated, and none of those 13,097 acres would be withdrawn from mineral location and leasing, despite the area's importance for fish, wildlife, cultural and scenic values (dRMP, page 65).

**Response:** We determined that the Muddy Creek/Big Sheep Creek proposed ACEC met the importance criteria only for the cultural and scenic values identified. The most critical cultural resource values occur in the portion of the nomination proposed for designation. This portion of the nomination, 13,097 acres, would be designated as an

ACEC in the preferred alternative. If this area is designated an ACEC, plans of operation would be required before any locatable minerals could be developed. This plan of operations must include mitigation and design features that will protect the values in the ACEC. There is also a + mile No Surface Occupancy stipulation that applies along both Big Sheep and Muddy Creeks for oil and gas development. Scenic values would be managed under VRM Class I to protect the scenic quality. We feel that this management provides adequate protection of the relevant and important values in the Muddy Creek/Big Sheep Creek ACEC. We note that Maps 68, 71, and 73 reversed the Alternative B and D proposals and we have corrected these in the Proposed RMP/Final EIS.

**C35** **Comment:** In order for the BLM to meet it's mandate "to protect and prevent irreparable damage..." (43 USC §1702(a)), we ask that in addition to reconsidering the Blacktail Wildlife Linkage/Corridor Nomination, that the BLM also identify specific management actions that will be taken to safeguard the most important features of the corridor relative to wildlife movement. These actions should include:

- Protection of core areas.
- Keep motorized route density to less than 1 mile per square mile.
- Withdrawal from Mineral Development
- Actions, including expanding food storage orders and assessing impediments to wildlife movement and committing to further management actions are very positive and should be applied specifically to the Blacktail ACEC.

**Response:** Following a careful review of this ACEC nomination and the information provided to us by the nominator and based on the recommendation of our ID Team, the Dillon Field Manager determined that this nomination did not meet the relevance criteria to be considered a potential ACEC. No new information has been provided by the commenter that would change this determination.

We did recognize the importance of this and other areas to wildlife movement, especially special status species. The preferred alternative provides guidance to manage wildlife migration/dispersal corridors and to limit the amount of roads to no more than the current level. These management actions are described on pages 21-22 and pages 25-26 of the Draft RMP/EIS. We have adjusted language in the *Travel Management and OHV Use* section of the Proposed RMP/Final EIS to clarify how road densities would be considered during site-specific analyses. We have not, however added

lands to our wildlife migration/dispersal corridor areas from the Blacktail Wildlife Linkage/Corridor ACEC nomination. Our biologist and planning team did not concur that an increased boundary was necessary to provide adequate wildlife linkage.

**C36** **Comment:** ACEC protection of Big Sheep Creek was not accepted in its entirety, yet this acreage represents a unique landscape in Montana. The northernmost extension of a Great Basin ecotype, this basin represents critical winter ground for pronghorn antelope, pygmy rabbits and sage grouse, plus five streams in the area contain pure strains of westslope cutthroat trout. MWF believes it appropriate to conserve the area with an ACEC for the entire Sheep Creek/Muddy Creek basin.

**Response:** We determined that the Muddy Creek/Big Sheep Creek proposed ACEC met the importance criteria only for the cultural and scenic values identified. These values only occur in a portion of the nomination. This portion of the nomination, 13,097 acres, would be designated as an ACEC in the preferred alternative. A portion of the Big Sheep Creek Basin was also found to have met the relevance but not the importance criteria for wildlife values and a portion of the area met both the relevance and importance criteria as a natural process or system. The information provided by this commenter was considered during the review process for the two nominations. No new information has been provided by the commenter that would change this determination.

**C37** **Comment:** We would like clarification why wild sheep were only considered for the "relevance criteria" and not for the "importance criteria". Recent Research has shown that wild sheep are vulnerable to adverse changes in their environment; therefore, we see them as qualifying for the "importance criteria".

**Response:** The importance criteria for potential ACECs were applied to the habitats that were nominated, not to bighorn sheep populations. These criteria are found in **Appendix K** of the Draft RMP/EIS. While we found that bighorn sheep are susceptible to adverse change, the habitats that were nominated were not.

Even though we determined that these bighorn sheep areas did not meet the importance criteria for potential ACEC, bighorn sheep are a priority species that we manage habitat for. We feel that the standard management provisions in the preferred alternative provide adequate protection for bighorn sheep habitats.



**C38** **Comment:** Revisit the Badger Gulch/Reservoir Creek ACEC nomination; specifically the lack of bringing that nomination forward. The Badger Gulch/Reservoir Creek ACEC contains a unique mix of resource values. While I may agree that the vegetative habitat alone is not unique, the mix of dependant wildlife species, historic values, and the presence of sensitive plants and fishes makes this area unique and worthy of nomination.

**Response:** The Badger Gulch/Reservoir Creek ACEC nomination was evaluated for the wildlife and sensitive species plants located in the area. We determined that the area met the relevance criteria but not the importance criteria. The other values that you mentioned in your comment letter were evaluated in other nominations. The Lewis and Clark Trail nomination included the return trip route through this area and the westslope cutthroat trout habitats were included in the Westslope Cutthroat Trout Habitat nomination. The Sagebrush Creek nomination included the Badger Gulch/Reservoir Creek area and addressed the pygmy rabbit, sensitive species plants, sage grouse, antelope and other wildlife habitat values. We spent a considerable amount of time discussing the values included in these nominations and evaluating the information provided during the process. We concluded that the area met the relevance criteria but did not meet the importance criteria. The commenter has not provided any additional information that has not been considered during the evaluations.

**C39** **Comment:** We feel two ACEC areas earlier recommended by FWP (upper Horse Prairie and the upper Centennial) should have been included in your final selection because of the importance of native fish species in those areas.

**Response:** We have no record of any ACEC nominations submitted by anyone representing Fish, Wildlife and Parks. However, areas in the Centennial Valley and Horse Prairie Watershed were nominated and evaluated. A nomination was also received for Westslope Cutthroat Trout Habitats. This nomination was evaluated and we determined that it met the criteria for relevance and importance and was carried forward as a potential ACEC.

**C40** **Comment:** The lack of consideration of any ACECs for their WCT values is a major concern with this section of your plan. We would be willing to provide information to support the nominations mentioned above.

**Response:** We found that the Westslope Cutthroat Trout Habitats ACEC nomination met both the relevance and importance criteria and it was carried forward as a potential ACEC. We did not recommend that it be designated in the preferred alterna-

tive because the standard management practices outlined in the alternative protect the relevant and important values in these habitats. We feel that the standard management actions prescribed in the preferred alternative which include the conservation actions for WCT will provide adequate protection for these habitats.

**C41** **Comment:** We believe that there are several nominated ACECs which meet both the relevance and importance criteria and that the BLM was in error to not further consider these nominations.

**Response:** The process used to review ACEC nominations is described on pages 4 and 5 of the November 2002 document, "Relevance and Importance Evaluations of Area of Critical Environmental Concern Nominations" prepared by the Dillon Field Office. Recommendations made by both the BLM Resource Advisory Council and the BLM interdisciplinary review team along with the documentation of the review, were carefully reviewed by the Dillon Field Manager along with the information provided by the nominator(s), additional information gathered by BLM specialists and any other available information including but not limited to information from the USFWS, MFW&P and the Montana Natural Heritage Program. Nominators, both internal and external were asked to provide additional information to support the nominations in many cases. If the BLM interdisciplinary team or the RAC subgroup could not come to a consensus agreement of the relevance and importance of a nominated area, the Field Manager made the determinations on which nominations met the relevance and importance criteria following this careful review. Where consensus recommendations were made, the Dillon Field Manager adopted the recommendations in all but one instance. This does constitute a full and careful analysis and followed the BLM's guidance on evaluating nominations for potential ACECs.

**C42** **Comment:** The Big Sheep Creek Basin nomination was not accepted in its entirety. The dRMP includes a proposed Big Sheep Creek Basin ACEC consisting of 2,393 acres representing unique wetlands habitat and associated sensitive plant species. TWS supports the designation of this proposed ACEC in the final Dillon RMP, as discussed below. However, TWS is concerned by the BLM's failure to propose ACEC designation for the entire Big Sheep Creek Basin nomination – the total acreage of the nomination was 25,990 acres. The 23,597 acres excluded by the BLM's proposal represent critical winter range for antelope, pygmy rabbits and Sage Grouse, as well as breeding, nesting, and brood rearing habitat for a yearlong resident popu-



lation of about 200 Sage Grouse. Westslope cutthroat trout, a BLM species of special concern, can be found in at least 5 streams within the basin. On page 9 of the ACEC Report, the BLM acknowledges the relevance of these values, but rejects their “importance” for ACEC designation. TWS disagrees with this assessment and encourages the BLM to reassess its decision. The entire Big Sheep Creek Basin nomination should be accepted and designated as an ACEC in the final Dillon RMP.

**Response:** A portion of the Big Sheep Creek Basin was found to have met the relevance but not the importance criteria for wildlife values and a portion of the area met both the relevance and importance criteria as a natural process or system. The information provided by this commenter was considered during the review process for the nomination. No new information has been provided by the commenter that would change this determination.

**C43 Comment:** The proposed Big Sheep Creek Basin ACEC should be included in Alternative B. The wetlands are unique as evidenced by the number of rare plants. Similar habitat on private land is threatened by human-caused alterations such as agricultural development and alteration of hydrologic regime. Surrounding uplands should also be included in the ACEC in order to protect hydrologic integrity.

**Response:** The Bureau guidance on designating ACECs states that the designation of an ACEC is based on whether or not a potential ACEC requires special management attention in the selected plan in order to protect the relevant and important values of the potential ACEC. As stated on page 314 of the RMP, the management identified under the standard provisions outlined in the preferred alternative would provide protection of the relevant and important values of the five potential ACECs that would not be designated under this alternative. Since no “special management” is needed, the areas, including Big Sheep Creek Basin, would not be designated under the preferred alternative.

The standard management provisions in Alternative B include a requirement for field inspections to identify locations of special status plant species prior to surface disturbing activities and a restriction on these activities within the boundaries of populations of special status plants. Meeting the standards for upland and riparian health provides protection for the hydrologic regime by ensuring that adequate soil cover is present to prevent erosion and maintain the water and nutrient cycles.

**C44 Comment:** It is essential that an ACEC be developed for Greater sage-grouse, but none is proposed

under the DRMP’s preferred alternative. Two ACEC nominations were submitted to the BLM which would be suitable, one designed specifically for sage-grouse and another for sagebrush dependent species and rare plants. Why does the DRMP not contain any ACEC designations, or even alternatives for designation, despite two substantial nominations?

**Response:** Several nominations were received and reviewed that included sage grouse values as at least one value in the nomination. One included all sage grouse habitat in the planning area while the others included sage grouse values as a component of the nomination. All of these nominations were carefully evaluated during the ACEC evaluation process. We determined that sage grouse habitat met the relevance criteria but not the importance criteria. This determination was made based on the review of the distribution of sage grouse habitat in the planning area, the State of Montana and the region. There are currently 22 active sage grouse leks known on public lands in the planning area and there are 647,000 acres of occupied public land habitat as outlined in the Draft RMP/EIS on pages 166-168. The importance criteria for ACECs state that the values considered should have more than local significant qualities which give it special worth, consequence, meaning, distinctiveness, or cause for concern, especially compared to any similar resource. When we considered sage grouse habitats in the planning area and the region, the nominations clearly did not meet these criteria. We also considered whether these habitats had qualities or circumstances that make them fragile, sensitive, rare, irreplaceable, exemplary, unique, endangered, threatened or vulnerable to adverse change. When we reviewed that amount and dispersion of the habitat in the planning area and region, we did not find that these habitats met these criteria either.

Although the nominations that included sage grouse habitat areas did not meet the importance criteria for potential ACECs, sage grouse are a priority species that we manage habitat for. We feel that the standard management provisions, including the implementation of the National and Montana sage grouse strategies, in the preferred alternative, provide adequate protection for sage grouse habitats.

**C45 Comment:** We request that the BLM reconsider the following ACEC nominations: The Muddy Creek/Big Sheep Creek nomination, for protection of sage grouse and their habitat, and the westslope cutthroat trout ACEC nomination. This ACEC nomination would protect critical cutthroat trout populations on the DFO.

**Response:** As reported in the November 2002 document, “Relevance and Importance Evaluations of Area of Critical Environmental Concern Nominations” prepared by the Dillon Field Office, the Muddy Creek/Big Sheep Creek ACEC was found to meet the relevance and importance criteria for cultural and scenic values. The portion of the nomination for cultural and scenic values was carried forward as the ACEC nomination. The area did not meet the importance criteria for wildlife values. No new information has been provided by the commenter that would change this determination.

We found that the Westslope Cutthroat Trout Habitats ACEC nomination met both the relevance and importance criteria and it was carried forward as a potential ACEC. We did not recommend that it be designated in the preferred alternative because the standard management practices outlined in the alternative protect the relevant and important values in these habitats. Standard management actions prescribed in the preferred alternative along with the conservation actions for WCT provide adequate protection for these habitats.

**C46 Comment:** The entire ACEC process used by BLM was flawed and designed more to limit and eliminate nominations than to give them priority in the planning process as outlined in the Federal Land Policy and Management Act (FLPMA). In particular, dropping or ignoring ACEC nominations for wild bison, bighorn sheep, sage grouse, sagebrush, native fish, and fish and wildlife in general makes no sense at all. Certainly wild bison would require special management on BLM lands and must be consider relevant and important to southwest Montana, America and even an international audience. Yet BLM’s process precludes a wild bison and elk ACEC from even being seriously considered. Why did BLM conclude that native wild bison recovery, conservation and management to historic habitat is beyond the scope of this analysis when the Montana Department of Fish, Wildlife & Parks and others have indicated an intention to expand the range of native bison in Montana? When will wild bison recovery, conservation and management on BLM lands in southwest Montana become a priority if not during this land use planning process?

**Response:** The Greater Yellowstone Elk and Bison ACEC nomination was submitted by the Gallatin Wildlife Association on September 13, 2003. Nominations received after August 15, 2002, were not considered in this planning process. However, bison issues are addressed on page 8 of the Draft RMP/EIS.

The process used to solicit and review ACEC nominations is described on pages 3, 4 and 5 of the November 2002 document, “Relevance and Im-

portance Evaluations of Area of Critical Environmental Concern Nominations” prepared by the Dillon Field Office. A review of this document will show that the process was open and nominations were carefully considered. This does not constitute a flawed process but one designed more to encourage public involvement and submission of complete and timely nominations for potential ACECs.

## BACK COUNTRY BYWAYS AND NATIONAL TRAILS

**D1 Comment:** The Back Country Byway designation for the Big Sheep Creek-Medicine Lodge roads is a bad idea. Designation will draw more tourist traffic to these fairly primitive roads (right now the roads are not really appropriate for motor homes most of the year). The result will be improving the roads with more heavy equipment, etc. This, in turn, will bring more traffic, including motor homes. Increased traffic and construction will bring more weeds and increased off-road use by motor-home people (most whom have ORVs). These fragile, high-elevation steppe and wetland habitats should be protected from any unnecessary disturbances. It may be just coincidence but it seems to me that I never saw knapweed at the little Deadwood Creek campground until after the road was declared a scenic byway. I also think that the increased traffic is going to anger the local residents and make it more difficult to accomplish important resource management goals in this biologically important area. I would discontinue the scenic byway designation unless most of the residents support it.

**Response:** The Back Country Byway was designated in 1989 – fifteen years ago. Any jump in vehicle use probably happened quite some time ago. Although it likely continues to get more use than it would without the designation, use levels are not likely to change very much from current levels. The purpose of the Byway designation is to highlight the resource management activities that occur in the area for the benefit of the visiting public. Management actions that interfere with those activities would be inconsistent with the purpose of the designation. We believe the spread of knapweed in general is related to numerous situations unrelated to the Byway designation. Since this was the only comment received relative to the Back Country Byway designation, it would not appear that the local residents are overly concerned.

**D2 Comment:** Volume 1, Chapter 2, Table 13, Page 147. Nez Perce Trail and the Lewis and Clark Trail. A one-half mile buffer on each side of the trail as a no-surface occupancy is too wide. One-quarter mile

on each side provides for adequate protection. Does no surface occupancy mean no cows? If so, how is this to be done? Any action proposed near these trails will require a NEPA document as with any action elsewhere. As such, the trail can be afforded the needed protection without any written statement about prohibitions.

**Response:** The discussion referred to is in regard to oil and gas leasing and does not apply to cows/livestock grazing. A review of management prescriptions associated with designated National Historic Trails in other states was conducted which indicated that (depending on vegetation and terrain) + mile buffers may not encompass enough area to protect the visual integrity of the trails. Based on local terrain and landscapes in southwest Montana, a + mile buffer on either side of the trail would be determined to be more appropriate. The No Surface Occupancy (NSO) stipulation will allow oil and gas leasing within the protective corridor, but drilling facilities and equipment must be located outside of the protective corridor.

**D3 Comment:** The RMP fails to adequately discuss the significant contribution of Clark Canyon Reservoir to the Beaverhead River fisheries, water quality, watershed importance, recreation, and the Lewis and Clark Trail. This is important as many of BLM's management proposals are directly tied to the Beaverhead.

**Response:** The management of Clark Canyon Reservoir by the Bureau of Reclamation and the local irrigation district is beyond the scope of the RMP. However, other BLM planning documents have acknowledged the effect that fluctuating water levels released from Clark Canyon Reservoir have affected river bank stability, riparian habitat, and water quality. In regard to the Lewis and Clark National Historic Trail, the inundation of important Lewis and Clark camp sites by Clark Canyon Reservoir and the reservoir's effect on the visual quality of segments of the trail are not necessarily considered a beneficial contribution to the preservation of the Lewis and Clark National Historic Trail. Also see response to Comment Z11.

**D4 Comment:** FWP supports the management of the Lewis and Clark National Historic Trail.

**Response:** Thank you for your support.

## CONSISTENCY

**E1 Comment:** The Counties concluded after their review and independent review that Alternative B, with some adjustments, is the alternative that is most consistent with the Counties' plans.

- Livestock grazing-B&C may be inconsistent because each calls for a reduction in grazing opportunities.
- Gas & Oil-B&C may be inconsistent because each calls for a reduction in leasing opportunities.
- Travel Management-\*All alternatives call for at least a small reduction OHV access and may be inconsistent for that reason. \*For example: Alternative B is the most consistent with the County plan but Alternative B is inconsistent with the County's plan to the extent that it limits aerial spray of herbicide to reduce the spread of noxious weeds. This section should be replaced with the more aggressive Alternative D.
- Vegetation-Invasive and Non-native species, including noxious weeds. Madison County-Alternative D. Beaverhead County-Alternative D.

The Counties' believe that a more proactive approach towards resource use, improvement, and preservation, similar to that set forth in Alternative D, is most consistent with County objectives to preserve and promote resource-based activities-both new and old-within the Counties. This adjustment to the preferred alternative is also consistent with moving toward the desired conditions specified in the SIIMPLE Model.

**Response:** We appreciate the consistency review provided by Beaverhead and Madison Counties. We do not agree that the management of livestock grazing in Alternative B is inconsistent with the provisions in County planning documents that encourage maintenance and enhancement of desired plant communities and riparian areas and enhancement and restoration of wildlife habitat. The reduction in oil and gas leasing opportunities (16,238 less acres available in Alternative B than in Alternative A, existing management) is mostly a result of coordination with the Agricultural Research Service on leasing of federal minerals beneath lands administered by them, and will not be changed in the Proposed RMP/Final EIS. We have made adjustments to Alternative B regarding specific route designations to address a number of public comments, including the Counties. We have not adjusted the weed provisions included in Alternative B. The interpretation that Alternative B limits aerial spray of herbicide to any great extent is in error. The alternative simply requires that consideration be given to particular values if and when a proposal is made to conduct aerial spraying.

**E2 Comment:** As part of the Governor's Consistency Review, a report or presentation by the DFO should

be prepared affirmatively demonstrating due diligence in achieving the requirement of “consistency” with state law. The report or presentation should be provided at the beginning of the Governor’s Consistency Review period.

**Response:** The DFO hopes to provide the Governor’s Office a briefing prior to formal release of the Proposed RMP/Final EIS. The formal consistency review occurs upon the release of the Proposed RMP/Final EIS.

**E3** **Comment:** In reviewing the text of the Draft EIS, the discussion of consistency with State law and/or citations of State law were less than expected. Preparation of a report or presentation would affirmatively demonstrate the DFO’s diligence in achieving the FLPMA requirement of “consistency” with the various state laws and plans may be helpful to a timely and efficient Governor’s consistency review.

**Response:** The Federal Land and Policy Management Act requires coordination with States and local governments to keep apprised of and consider plans that are germane in the development of land use plans for public lands and to resolve, to the extent practical, inconsistencies between federal and non-federal plans.

We have contacted the Governor’s office throughout the planning process since the beginning of the process in 2001, and most recently spoke with Tom Beck on July 1, 2004 ( in the absence of Todd O’Hair, the Governor’s Natural Resource Advisor) in regard to the Dillon RMP. Mr. Beck’s main advice was to assure the State agencies involved in resource management were given the opportunity to be involved in the process. To date, the Governor’s office has not identified any inconsistencies, but simply reiterated the same language included in the Beaverhead and Madison County comments. The Governor’s office will have a formal 60-day consistency review upon release of the Proposed RMP/EIS.

Our intent in providing the Draft RMP/EIS to the Governor’s office as well as a number of State agencies including the Department of Natural Resources and Conservation (DNRC), the Department of Environmental Quality (DEQ), the Department of Fish, Wildlife and Parks (FWP), the Montana Department of Transportation (MDOT, and the State Historic Preservation Office (SHPO) was to allow for those entities to identify any inconsistencies and offer comments to modify the plan prior to the official consistency review. We have reviewed comments received from the State agencies and have made adjustments where necessary. Since all of the laws of the State of Montana and

the Administrative Rules of Montana (ARM) are not necessarily germane to public land management, we have concentrated on adjustments necessary to be consistent with plans, policies and programs of the State as identified in the comments provided on the Draft RMP.

**E4** **Comment:** The Draft EIS is unclear as to how closure of up to 47% of the DFOs roads to motorized access is a coordinated proactive approach to management consistent with Montana’s 2003-2007 Travel Montana Strategic Plan.

**Response:** We have reviewed the Montana Tourism and Recreation Strategic Plan 2003-2007 and see no goals or objectives inconsistent with the Dillon RMP. In fact, the approach used to engage citizens representing both motorized and non-motorized interests in addressing route designations through a subgroup of the Western Montana RAC seems quite consistent with actions listed in the section on *Managing the Use of Assets* in Chapter 5 of the cited Strategic Plan. Among the items identified in the Strategic Plan’s Vision is “Balance.” The discussion of balance even describes the importance of the diversity of recreation experiences. If the entire planning area is open to motorized use, it would not appear to offer diverse recreational experiences or “balance.” The Strategic Plan also identifies in its “Guiding Principles” the need to “Respect diverse needs, perspectives and concerns...” Much of the travel management portion of this final plan is a direct response to the various and diverse needs, perspectives and concerns identified in response to our draft plan. The concerns expressed, and addressed in this final plan, were representative of both motorized and non-motorized recreational interests. Tourists choosing to visit Montana frequently cite the natural beauty of the state as their reason for visiting. They seldom identify the availability of open motorized routes as a primary reason for visiting.

**E5** **Comment:** Totally in compliance with NEPA, Beaverhead County now has a County Resource Use Plan and cooperating agency status with the BLM. Unfortunately, Alt B ignores the BCRUP when it states on page xiii of Volume 1, under the topic of Environmental Consequences: “constrain certain activities in order to maintain or improve land health conditions. This would result in short-term impacts to local economies and business, but long-term benefits as economies and business adjust to providing for services related to improved conditions.” Translated this means an end of multiple-use; which also means the end of a county tax base too. And further translated, this means a



future of service industry jobs to better serve tourism! (this is the total the opposite of the guidelines of FLPMA).

**Response:** Each alternative provides a framework for multiple-use management as defined by FLPMA. There are constraints identified in all alternatives presented in the Draft RMP/EIS (not just Alternative B), and impacts are disclosed within the *Environmental Consequences* section. The Beaverhead County Resource Use Plan has not been ignored in development of this plan. In fact, maintaining and improving land health conditions as stated on page xiii is consistent with objectives set forth under the Livestock Grazing and Forest Management sections of the BCRUP, as well as in other sections. In addition, contrary to the statement that the BCRUP is in compliance with NEPA, Beaverhead County has not prepared (nor is required to prepare) an EA or EIS to our knowledge that discloses the impacts of implementing their plan.

**E6** **Comment:** Consistency with the County and State would be appreciated.

**Response:** BLM took a collaborative approach in developing this RMP/EIS. Both Beaverhead and Madison Counties acted as Cooperating Agencies in development of the plan, with a representative participating in all RMP development meetings. Involvement from State agencies, especially those managing lands adjacent to public lands in the planning area was requested throughout the RMP process. See responses to Comments E1 and E3 for further discussion.

## CULTURAL RESOURCES

**F1** **Comment:** Under “Cultural Resources” we prefer the wording of Alternative D, simply because we feel the less attention brought to those cultural resources, the less negative impact they will receive. We support the recommendation put forward by the WZRAC. Note: the discussions of the Western Montana Resource Advisory Council (but not a formal recommendation) suggested that specifying acreage amounts for “proactive” Section 110 inventory under the National Historic Preservation Act was not necessary or warranted.

**Response:** As noted in Chapter 3, the Bureau of Land Management is legislatively mandated to preserve and protect significant cultural resources. Goal 4 for Cultural Resources identifies management for educational and public outreach efforts which is common to all alternatives. Similarly, defined “site use categories” would only identify those cultural resources for public use which have

high interpretive potential and whose integrity could be insured through additional protective measures. Under Section 110 of the NHPA, federal agencies are required to establish procedures for the identification, evaluation, protection, and nomination of significant properties to the National Register of Historic Places. These efforts are also completed in consultation with the Montana State Historic Preservation Office which has expressed concerns about the ability of the BLM to meet the Section 110 requirements without specific target acreages for proactive cultural resource inventory being established in the RMP (see Comment F2).

**F2** **Comment:** We support the approach of proposing specific minimum acreage per year of section 110 inventories. In these days of fiscal difficulty, it is likely that the statutory requirement of the NHPA to complete such work will often be pushed to the side in meeting the day to day Section 106 needs driven by other resources in the absence of a management plan requirement for doing the 110 cultural work. Alternate C provides a more defensible (and yet still moderate) level of section 110 commitment than Alternate A. Under C a more representative sample would be collected over the life of the Plan since in addition to more acres inventoried—some non-high probability approach of this sort simply by looking at high probability areas alone as is proposed under A and B; especially if you have looked at only 2% of the planning area over the life of the Plan (page 19).

**Response:** The sampling strategy for proactive (Section 110) inventory presented in Chapter 2 was rewritten to provide more clarity. Alternatives B and C both provide sampling strategies that incorporate proactive cultural resource inventory that is representative of both high and low site probability areas. Alternatives B and C differ only in the amount of inventory that would be completed on an annual basis.

**F3** **Comment:** We suggest that Alternative C oil and gas section is again more reasonable and responsible from a cultural perspective than B. In our experience standard lease notices and terms often cannot meet the intent of the NHPA. In fact current leasing procedures are inherently contradictory to the intent and requirements of the NHPA and 36CFR800 in that the act of leasing is an undertaking, one in which the boundaries of lease parcels, standard notices and terms, and geomorphology may all come together to prevent the Agency from avoiding effects to sites which were not considered prior to approving the undertaking (selling lease rights). Since section 106 is not com-



pleted prior to an APD, the result is a foreclosure under 36CFR800 in situations where resources or effects to them are not identified until after the lease is issued and APD is submitted (and then subsequently can not be avoided). As an example such was the case at Weatherman Draw. Cultural Resources are sacrificed for the price of a lease rental and the agency stands to face legal challenges in the process. Here the risk of foreclosure and unconsidered adverse effects is not in the least offset by the potential for royalties and production since the foreseeable development to forecast is low. It is much more managerially responsible to apply the Alt C Stipulations as opposed to those of Alt A or B (see page 49). It would cost almost nothing to withdraw known sites from lease.

**Response:** The RMP contains allocation decisions identifying those lands that are available and not available for oil and gas leasing. Lease sales and subsequent development are the actions where site specific environmental analyses are conducted. BLM is currently in the process of reviewing leasing procedures in light of provisions of NHPA including tribal consultation issues. We agree that standard lease terms may not adequately protect significant cultural resources in all instances. For this reason Alternative B imposes a No Surface Occupancy (NSO) stipulation, in addition to standard lease terms, for all eligible properties. We feel that the No Surface Occupancy stipulation protects significant cultural properties as effectively as the No Lease stipulations presented in Alternative C.

**F4** **Comment:** Where lands are designated as ACEC or other protective statuses, that designation should include enough lands so as to not pin point the location of the protected resource.

**Response:** This issue was considered as boundaries were delineated during the ACEC nomination and evaluation process.

**F5** **Comment:** The Draft EIS does not demonstrate that the history of the Ney homestead is more historically noteworthy than any of the other ranches and/or families discussed in many history books about Beaverhead and Madison Counties.

**Response:** We agree that there are many ranches in private ownership that are of historical importance and contribute greatly to the custom, culture and economy of southwestern Montana. However, the BLM must limit its concern to the management of cultural resources under its jurisdiction and control. The Ney Ranch is unique, in that it is one of only a handful of examples of early homesteading/ranching in SW Montana that are under the protection and management the BLM.

**F6** **Comment:** Cultural Resources: Under Alternative A they are already protected by law from vandalism and have proactive management.

**Response:** As noted in Chapter 2, management common to all alternatives would identify, monitor, protect, and preserve significant cultural resources in accordance with Sections 106 and 110 of the National Historic Preservation Act. It is the level and degree of “proactive” management that varies by alternative.

**F7** **Comment:** FWP supports the withdrawal of Beaverhead Rock from mineral entry and for the potential conveyance of this area to the state of Montana.

**Response:** As noted in Chapter 2, Beaverhead Rock is proposed for mineral withdrawal and BLM lands could be considered for transfer to Montana Fish Wildlife and Parks through the use of the Recreation and Public Purposes Act under Alternatives B, C, and D.

**F8** **Comment:** A Fire Management Plan that includes cultural resource consideration and specialists in a consistent and proactive manner is missing. For example, the RMP discusses management Categories A-D, but does not seem to identify how actual lands are assigned to categories or how the response to fires in those categories by non BLM responders would consider cultural resources in initial attacks, dozer line placement, BAER etc. I suggest that the RMP should include development of a Fire Management Plan that specifics and describes consideration of cultural resources in various fire responses and management activities (e.g. mechanical fuel reduction over sites, protective prescriptions for controlled fire, etc.).

**Response:** The *Description of Fire Management Categories* on page 62, Chapter 2 of the Draft RMP/EIS describes the desirability of both wildland and prescribed fire based on resource and social conditions. The Fire/Fuels Management Plan Environmental Assessment/Plan Amendment for Montana and the Dakotas (2003) describes the rationale for categorization in Section 2.5, Table 2, page 14. This document is available at [www.mt.blm.gov/ea/fire/fireplan/cover.pdf](http://www.mt.blm.gov/ea/fire/fireplan/cover.pdf). The Fire/Fuels Plan for Montana and the Dakotas also describes in detail BLM responsibilities regarding cultural resource protection and provides direction to all fire suppression forces responding to wildfires on BLM administered lands in Section 2.5, *Cultural and Paleontological Guidance for Fire Suppression and Fuels Management*, pages 17-18.

As stated in Chapter 3, page 227 of the Draft RMP/EIS, a new Fire Management Plan will be developed for the planning area upon approval of

the RMP. The preparation of a Fire Management Plan is an implementation level planning effort that is most effectively conducted after an Approved RMP has identified appropriate Fire Management Areas. Any Approved RMP will maintain the direction provided in the Fire/Fuels Management Plan E.A/Plan Amendment for Montana and the Dakotas. During the subsequent development of the Dillon Field Office Fire Management Plan, procedures will be developed to insure that significant cultural properties are identified and protected during fire suppression and rehabilitation efforts. In addition, the Montana State Historic Preservation Office will be consulted during the development of the fire management plan.

- F9** **Comment:** We suggest that the Barton Gulch site near the Ruby Reservoir and adjacent to BLM lands be considered for acquisition and ACEC status. Perhaps an exchange with Turner Enterprises could be designed and reduce BLM inholdings?
- Response:** Identifying specific parcels of land for acquisition is outside the scope of the RMP. Criteria used to prioritize areas for acquisition are identified in **Appendix F** of the Draft RMP/EIS and include a factor for “significant cultural resources”. Outside of the RMP process, the Dillon Field Office is completing a feasibility analysis and developing partnerships as preliminary steps in pursuing the Barton Gulch site acquisition.

## ECONOMICS

- G1** **Comment:** Cost of Operation: BLM management decisions and actions that increase the costs of operations for public land users should be considered in the economic analysis. These increased costs should also be considered in the economic analysis of local impacts to the counties.
- Response:** We have added information to the *Economics* section in Chapter 4 of the Proposed RMP/Final EIS by using an economic impact assessment modeling system (see Tables 56, 60, 64, 68 and 72 in the Proposed RMP/Final EIS). Costs of operation associated with BLM authorized activities on public lands (e.g. grazing management and timber management) are reflected in the economic impact assessment modeling system used to predict changes in employment and labor income. The context of these changes which are expressed in terms of changes to the local economy are also described in terms of relative importance to economic activity within the local and regional economy.
- G2** **Comment:** Protected Areas: The draft plan puts forth an antiquated view of economic benefits our

public lands can provide us. The goal on page 100 of the Draft RMP/EIS of extracting forest products while contributing to the economic stability of the community completely ignores information showing that mining, logging and oil and gas development are not a source of jobs or personal income, and have not been for three decades.

Protected lands are the true positive predictor for economic growth and stability, not extractive industries. Protected lands especially in remote western counties are one of the key factors to a strong local economy. Madison and Beaverhead Counties have all the other key factors, but lack in protected public lands. Please see the enclosed report entitled *Prosperity in the 21<sup>st</sup> Century West*.

**Response:** The economic conditions and trends described in Chapter 3 on pages 239-253 of the Draft RMP/EIS are based on most current economic information and trends available for Beaverhead and Madison counties. Current trends among key industries associated with public land uses in Beaverhead and Madison Counties are also described in detail. The relative importance of employment among economic sectors is also presented in Table 48 of the Draft RMP/EIS.

In the report *Prosperity in the 21<sup>st</sup> Century West*, (Rasker et al. 2004), the authors “found that there are many other important pieces of the economic development puzzle, and that not all communities benefit equally from protected lands. Access to metropolitan areas, via road and air travel, is also extremely important, yet some rural communities are remote and isolated. The education of the workforce, the arrival of newcomers, and a number of other factors allow some areas to flourish and to take advantage of protected lands as part of an economic development strategy. Communities without these economic assets, in spite of being surrounded by spectacular scenery, tend to struggle.” (Rasker et al. 2004, page 1). The primary purpose of this Resource Management Plan is to respond to a multiple resource management mandate, as opposed to an economic growth and development mandate. The RMP does identify an economic goal to “provide for a diverse array of stable economic opportunities in an environmentally sound manner” (page 129 of the Draft RMP/EIS). The indicators of economic impacts that are addressed for each alternative and help determine how well each alternative achieves this goal include employment, labor income, economic diversity as indicated by the number of economic sectors, economic dependency as indicated by the number of industries that dominate the economy, and economic stability as indicated by seasonal unemployment, sporadic population changes, and fluctuating income growth rates. Other economic

indicators include changes in government revenues and costs to government. Local economic trends and anticipated impacts are presented in Chapters 3 and 4.

**G3 Comment:** Grazing Management: The economic impacts associated with livestock management underestimate the economic effects on livestock producers and they do not account for difference between grazing preference and authorized use.

**Response:** Actual use at a level below preference is often initiated by the permittees in response to drought, the desire for rest rotation, or other fluctuations in the livestock operation. Analysis of anticipated livestock grazing use levels under each alternative provides a better basis for comparing economic impacts attributable to BLM resource management considered in this Resource Management Plan than comparing changes in preference for each alternative. If anticipated economic impacts were based on changes in preference levels, those impacts would include changes that have occurred in the past and would occur in the future that are often initiated by the livestock operator for purposes other than BLM resource management. Changes in livestock use would be spread unequally among the affected operators. The economic impact on individual operations would also vary depending on such factors as size and type of operation, seasons of use, dependency on public lands, changes in authorized use, capital reserves, and diversification of operation. Effects on private real estate values on lands with BLM grazing privileges may be influenced by changes in grazing preference. Estimates of the value of BLMAUMs range from \$0-\$100 depending on the property. (While BLM does not recognize real estate value of BLM AUMs, discussions with realtors and appraisers in southwestern Montana indicated that the real estate value of BLM AUMs could range from \$0-\$100 per AUM depending on the property.)

**G4 Comment:** Grazing Management: Economic impacts to the average operator do not portray disproportionate impacts to some operators. Economic effects to livestock producers should be calculated based on an estimated cost of feeding hay to cattle at \$45/AUM. Economic impacts of feeding livestock are understated when based on the assumption of feed costs of 25 pounds per day. Other available pastures would not be available to feed up to 40,500 AUMs. The economic analysis of effects on livestock producers should disclose where the impacts occur and the extent of those impacts. The analysis should also disclose the additional management costs associated with fencing, herding, etc.

The BLM must analyze the benefits and costs of livestock grazing.

**Response:** The description of economic impacts has been modified in the Proposed RMP/Final EIS to indicate that impacts would be spread unequally among the affected operators. The economic analysis has also been modified based on regional input-output accounts and models to track changes in local employment and labor income within the agricultural livestock sectors in response to changes in BLM grazing management. Since the response by operators will vary, the effect on individuals is not included. The local economic effects in terms of employment and labor income are not based on the anticipated response of individual operators to BLM management decisions. See the *Economics* sections in Chapter 4 of the Proposed RMP/Final EIS for text revisions.

**G5 Comment:** Recreation, travel, and wildlife-related economic impacts: Comments included such thoughts as “A fair mix of recreational opportunities would benefit local economies.” “Recreation use and associated economic benefits of recreation use will decline if roads are closed.” “Road closures will affect land uses and cause social and economic impacts.” “The personal and economic value of quiet trail usage is underestimated.” “The final RMP should recognize the economic and social value of sage grouse.”

**Response:** The current economic influence of an estimated 335,000 recreation visits on DFO-BLM public lands (based on information from Chapter 3 of the Draft RMP/EIS) is 311 total (direct, indirect, and induced) local jobs and \$6.67 million in total labor income based on results from the economic impact assessment model. Changes in BLM resource management among the alternatives may result in changes in recreation use levels. However, the extent of these changes and the net effect of road closures, quiet trail usage, and management actions to protect sage grouse are unknown for each alternative. It is estimated that within the local economy, total (direct, indirect, induced) jobs change by one for every 1,078 change in visits. The average total (direct, indirect, induced) labor income generated by each visit is \$19.91. See Table 56 in the Proposed RMP/Final EIS for assumptions. Tables 60, 64, 68, and 72 depict change across the alternatives, though for recreation, that change is unknown.

**G6 Comment:** Oil and Gas Management: Social and economic analysis of potential oil and gas development should address changes in severance, ad valorem, sales taxes, mineral royalties. The analy-

sis should also compare earnings from oil and gas, timber, mining, agricultural, and recreational industry employees. Economic impacts to surrounding communities have not been considered.

**Response:** Assumptions upon which economic impacts of oil and gas exploration, development and production are based can be found at the beginning of Chapter 4 under the *Economics* assumptions. We have added additional information to both Chapter 3 and Chapter 4 in the *Economics* sections to address this comment.

**G7** **Comment:** Forestry Management: The BLM should be a more reliable supplier of forest products. Past variability in timber sales activity has hurt the economy. The cumulative impact analysis of forestry management does not include the closure of the Stoltze mill in 1990.

**Response:** The primary mission of the Bureau of Land Management is to sustain the health, diversity and productivity of the public lands for the use and enjoyment of present and future generations; not necessarily to provide a reliable supply of forest products. Other demands such as complying with the many environmental laws, policy initiatives, and budget constraints also influence the level of BLM activity at the field office level. Between 1980 and 2003, the Dillon Field Office of the BLM (DFO-BLM) offered timber sales that averaged 925 MBF per year, an average of five percent of total timber sales within the two counties. Although the DFO-BLM has not been a major local supplier of forest products, BLM lands with forest type vegetation (including non-commercial type forest vegetation) only account for about eight percent of forested lands within the two counties. BLM has been providing close to a proportionate share of timber sales within the counties. Of the four alternatives analyzed in detail, only Alternative C would offer a timber sales volume less than this level. Timber sales volume would more than double with Alternative A, triple with Alternative B, and increase more than six fold with Alternative D.

Past contributions of BLM forest products to the local economy are described in the *Economics* section in Chapter 3, under *Key Industry: Forest Products*.

**G8** **Comment:** Cumulative Economic Effects: The social and economic analysis should include cumulative impacts that include past actions.

**Response:** Social and economic trends and conditions relevant to natural resource management in the two-county area are summarized in Chapter 3 of the Draft RMP/EIS on pages 239-264. Included

in this description is a focus on key industries in the planning area affected by BLM management, as well as analysis of past actions that are relevant to the resource management alternative and understanding the context of impacts related to those alternatives. Cumulative impacts are addressed in Chapter 4 social and economic impact analyses.

## FIRE AND FUELS

**H1** **Comment:** Describe in detail what “Wildland Urban Interface” (WUI) really is. It is a misled and unjustified government program to reduce the fire hazard on public land to protect private landowners who decided to build next to public land. Landowners should reduce their own fire hazard, cut their trees and brush and buy fire insurance like the rest of us. “WUI” is a farce and waste of public money and will destroy wildlife habitat and the esthetics of public land. It has nothing to do with range and forest ecology so don’t mislead the public. Your document is inaccurate and this section should be deleted. Include also in a new ALTERNATIVE D.

**Response:** The BLM is operating under laws, regulations and policies, as well as the most current scientific knowledge, in effort to reduce the risk of catastrophic wildfires by restoring healthy, viable ecosystems to our public forests and rangelands. These efforts include fuel reduction projects designed to protect communities at risk of wildfire and promote the safety of firefighting personnel. Prescribed fire is a tool used by managers to reduce the risk and intensity of wildfires, as well as to reintroduce fire back into fire dependent ecosystems. See the *Fire Management and Ecology* section of Chapter 3, page 227 of the Draft RMP/EIS for more details.

The Fire/Fuels Management Plan Environmental Assessment/ Plan Amendment for Montana and the Dakotas defines the wildland urban interface (WUI) as “The line, area or zone where structures and other human developments meet or intermingle with undeveloped wildland or vegetative fuels.” This document is available at <http://www.mt.blm.gov/ea/fire/fireplan/cover.pdf>. We have added this definition to the Glossary of the Proposed RMP/Final EIS.

**H2** **Comment:** What is missing here is a Fire Management Plan that includes cultural resource consideration and specialists in a consistent and proactive manner.

**Response:** As stated in Chapter 3, page 227 of the Draft RMP/EIS, a new Fire Management Plan for the planning area will be developed upon approval



of the RMP. See the response to Comment F9 for additional discussion.

**H3 Comment:** We request that the process include consideration of the negative impacts that proposed motorized road and trail closures will have on fire management, fuel wood harvest for home heating, and timber management.

**Response:** The *Forest Products* sections in Chapter 4, pages 309, 324, and 336 of the Draft RMP/EIS identify impacts pertaining to firewood access. The ability to travel as necessary for administrative and emergency fire situations as identified in **Appendix I** precludes impacts on fire and timber management.

**H4 Comment:** Without significantly restoring fire to a fire-adapted landscape, the landscape will continue to be degraded. We appreciate that the BLM has recognized the importance of fire on the landscape.

GYC supports restoring natural fire to the landscape, where public health and safety are not compromised. We therefore support the provisions in Alternative C, which “places a priority emphasis on allowing natural fire to be used for resource benefits, while providing an appropriate management response emphasizing initial attack, full suppression only to protect human life and other federal, state, private property, and areas such as threatened and endangered habitat and cultural sites.” (DEIS, p. 62). Given the relatively unpopulated nature of the resource area, the DFO seems the ideal place to attempt to restore natural fire, where feasible.

At a minimum, under all action alternatives, we ask that the BLM prioritize suppression activities to the wildland-urban interface.

**Response:** See page 63 of the Draft RMP/EIS for the goal statement pertaining to prescribed fire. Prioritization of suppression activities in the wildland urban interface is addressed under the Wildland Fire Goal on page 60 of the Draft RMP.

**H5 Comment:** The only information related to fire history on the resource area are a few general statements on pages 30-31, a chart taken from a 1977 study and a mention of identifying Condition Class 3 lands. It is critical that the BLM base its’ estimation of acreage needing treatment on something other than this anecdotal and outdated information. In order for the public to understand where fuels buildup is a problem, please provide more detailed information regarding fire history on forested landscapes.

**Response:** The Draft RMP discusses fire history of the planning area in the *Fire Management and*

*Ecology* section of Chapter 3, pages 227-232 of the Draft RMP/EIS. **Appendix J** describes each of the Fire Management Zones with reference to fire occurrence, interface issues and other concerns or constraints.

**H6 Comment:** Option C in fire suppression is simply out of the question. Holding the fire to a couple of acres and suppressing it completely is good judgement; Option C allows that small fire in the morning to become a huge, man-eating fire by the afternoon. That huge top fire is uncontrollable; it will burn across agency lines and across state lines.

**Response:** We acknowledge that this alternative involved “...the risk and exposure to fire fighter and public safety could increase as fires are managed for longer durations” as disclosed in the Chapter 4 impacts (see page 328 of the Draft RMP/EIS).

**H7 Comment:** Wildland Fire: B is superior. How does BLM plan on getting equipment and personnel to fires without roads?

**Response:** Motorized cross-country travel for fire operations for emergency purposes would be allowed as necessary as stated in **Appendix I** of the Draft RMP/EIS.

**H8 Comment:** Page 22: Wildlife: Sagebrush Steppe Habitat. The paragraph limiting prescribed fire to late summer or fall is inconsistent with the state plan. Often a cool season burn can be more beneficial than when conditions are so dry and hot that even the soil is baked. The BLM needs to retain the flexibility to use cool season burns when situations warrant.

**Response:** We have modified the paragraph in the Proposed RMP/Final EIS to read: *Impacts to migratory bird populations during breeding seasons would be minimized by using measures such as size of treatment area, timing, spacing of treatments, etc. when considering vegetative treatments (fire, fuels, habitat improvement, etc.).*

**H9 Comment:** We believe BLM management direction should assure that prescribed fire for hazardous fuel reduction and control or suppression of wildfire is conducted in a manner that minimizes potential nonpoint source pollution of surface waters. All bladed firelines, for prescribed fire and wildfire, should be stabilized with water bars and/or other appropriate techniques if needed to control excessive sedimentation or erosion of the fireline.

**Response:** All wildfire or prescribed fire situations have site specific mitigation. This is accomplished at the project level and beyond the scope of the RMP. Please refer to **Appendix J** in Volume



II, page 175 of the Draft RMP/EIS for general information regarding erosion and sediment control structures for emergency rehabilitation. Upon approval of the RMP, an updated Fire Management Plan will be developed for the planning area which will further address surface water quality standards.

- H10** **Comment:** We believe the RMP offers opportunities to address the heavy reliance on fire suppression by promoting increased public understanding of the necessary role of fire in forest ecosystems, and attempting to restore more natural fire disturbance regimes to forest ecosystems. We encourage improved public education programs to increase public understanding on the need for and value of fire in forest ecosystems. The risks of uncharacteristic disturbances such as catastrophic wildfire need to be evaluated versus the effects of fuels management actions designed to reduce those risks (i.e., water quality, fisheries and wildlife effects). Methods to address competing and unwanted vegetation and to reduce fuel loads and fire risk need to be evaluated in relation to concerns regarding water quality, fisheries and wildlife effects from fuel and vegetation treatments. Thresholds for acceptable environmental impacts for fuel treatments around WUI's and areas of severe fire risk may be higher.

Among the information to consider and analyze are: 1) Normal fire return intervals and mortality levels from disease or insects; 2) Post treatment landscape vs. desired forest age class, composition, structure (How far outside the natural range of variability and disturbance regimes are areas to be treated? What forest types (e.g., cold, moist, or dry), stand densities and species composition are to be treated? Do these vary from similar sites that have experienced natural disturbances? Is vegetation management directed at density management, thinning from below, strategically placed treatment units, etc.); 3) Funding for vegetation management (Are large trees being cut to fund restoration? Are wildlife or restoration funds available to carry out vegetation management to meet desired future conditions?); 4) Trade offs of adverse water quality, fisheries, wildlife impacts of vegetation management (Will fuels reduction require new road construction or reconstruction of roads? Will riparian areas, wetlands, and other important habitats be treated differently than the rest of the landscape?) 5) Monitoring (Is pre and post project monitoring proposed?).

**Response:** The Purpose and Need of the Draft RMP, stated on page *xi* of the Introduction, explains the RMP is designed to specify overarching management policies and actions on planning area lands. The statements and questions posed in your

comments are appropriately considered at the project level planning stage.

- H11** **Comment:** The RMP should reflect national fire management strategies and policies such as the 1995 Federal Wildland Fire Management Policy and Program Review (USDA and USDI 1995), that directs integration of fire into land management planning, working with landowners and stakeholders, and directing landscape level analysis; and the National Fire Plan directing full range of fire management activities linked to RMP's.

**Response:** The Draft RMPEIS identifies national, state, tribal and local planning criteria that aided in the development of this document in the *Introduction* section, pages 9-12. The Preferred Alternative in the RMP, Alternative B, will maintain direction provided in the statewide Fire/Fuels Management Plan Environmental Assessment/Plan Amendment for Montana and the Dakotas (2003). This document is available at [www.mt.blm.gov/ea/fire/fireplan/cover.pdf](http://www.mt.blm.gov/ea/fire/fireplan/cover.pdf). The Purpose of and Need for Action section of this document, on pages 1-7, explains the BLM's commitment to improving the implementation of the National Fire Plan and the 2001 Federal Fire Policy.

- H12** **Comment:** We must not let wildlife interests take prescribed fire away as a land management tool. Fire is nature's way of addressing structural and composition diversity in all the resources. Wildlife and natural systems are adapted to fire under natural fuel loads. Because man has interfered with this process, some fuel loads in some areas must be reduced using other methods before prescribed fire could again be employed as a positive tool. It is imperative that we systematically manage fuel breaks within the tremendous fuel loads we have allowed to accumulate.

**Response:** We concur.

- H13** **Comment:** We recommend that the evaluation for the need of management actions be coordinated with FWP area field biologists to ensure consideration of potential wildlife impacts such as those associated with key seasonal ranges.

**Response:** The section on *Management Common to All Alternatives*, pages 20 and 21 of the Draft RMP/EIS, states that "Vegetation treatment projects and management activities that influence wildlife habitat will be coordinated with FWP."

- H14** **Comment:** In regard to fire rehabilitation, it is important that we are patient after a fire and let nature take its course if the natural ecosystem was intact before the fire. This is especially true in sagebrush habitat. Generally, sagebrush will not return

to a burned area for several years in a natural system. This allows the herbaceous component to increase and build root reserves before it has to start competing again with sagebrush. This is very important in sustaining the grass component in sagebrush stands as they mature. If one immediately goes in and seeds sagebrush after a fire in a natural system, then this will shorten the time grass has to build reserves and will weaken the herbaceous component's ability to withstand grazing pressure or competition from brush, noxious weeds, or annual grass infestation. We must be patient and this must be included in the chosen alternative.

**Response:** Appendix J of Volume II of the Draft RMP/EIS identifies the process BLM would follow for emergency rehabilitation and stabilization efforts.

**H15 Comment:** Rehabilitation: How does BLM plan on getting equipment and personnel to fires without roads? How will BLM control invasive non-native weeds without equipment access?

**Response:** For fire emergencies administrative access would be provided as required. The RMP will adopt the North American Weed Management Association inventory and monitoring standards and policies and strategies detailed in the Montana Weed Management Plan (Duncan, 2001). The control of noxious weeds will be project specific and may include the aerial application of weed control chemical, the use of backpack sprayers and/or the use of biological control measures. Appendix J of the Draft RMP/EIS addresses the process BLM would follow for emergency rehabilitation and stabilization.

**H16 Comment:** The DRMP proposes to manage vegetation to reduce fuel loads through controlled burns and timber harvest, but does not say whether this will lead to road construction and a net increase in the miles of open roads or a net decrease in the extent of sage lands. We do not need more roads on BLM lands, and do not believe that controlled burns in sagelands will significantly reduce the likelihood of wildfire. The final RMP should discuss how fuels management can occur, for example through mechanical means rather than prescribed fire. Mechanical methods are more controllable, and are less likely to damage late-seral sagebrush communities.

**Response:** The *Travel Management and OHV Use* section of Chapter 2 of the Draft RMP/EIS states pages 58-60, that total road mileage within the planning area would not be increased under any of the action alternatives (Alternatives B, C and D) (see pages 58-60 of the Draft RMP/EIS. New roads developed for new activities (i.e. timber sales, min-

ing activities) could be left open only if equal road mileage was closed. We have clarified how this would occur in the *Travel Management and OHV Use* section of the Proposed RMP/Final EIS. Prescribed burning operations generally use existing roads for access and would not result in newly opened or accessible roads.

The BLM's preferred alternative (Alternative B) in the Draft RMP/EIS and in the Proposed RMP/Final EIS maintains the direction provided by the Fire/Fuels Management Plan Environmental Assessment/Plan Amendment for Montana and the Dakotas (2003) (available at [www.mt.blm.gov/ea/fire/fireplan/cover.pdf](http://www.mt.blm.gov/ea/fire/fireplan/cover.pdf)) which provides clarification regarding sagebrush management in section 3.1.13, page 24, and section 4.4, page 75.

**H17 Comment:** Fire Management: We like B, however we feel the BLM needs to combine prescriptive management for Category B and C areas. We'd like both areas to be more aggressive in fuels management, and less aggressive on fire suppression (in primarily uninhabited, forested areas) since fires in most cases shouldn't be as devastating if fuels are properly managed, and in many cases fighting fire is a huge waste of taxpayer dollars since the bad ones pretty much do what they want anyway—on top of that there is much greater problems with weed introductions and distribution from all the non-local fire equipment and vehicles.

**Response:** We believe our preferred alternative takes an aggressive approach in fuels management given the constraints with which we work under. However, until those uninhabited, forested areas the commenter refers to are within the natural range of variability, suppression will be considered a critical tool, especially adjacent or near wildland urban interface.

## FISH, including SPECIAL STATUS SPECIES

**I1 Comment:** Under the heading FISH on page 20, ALT B, it states "Habitats containing west slope cutthroat trout would be managed to achieve potential channel types and dimension within 15 years...". Under the heading Special Status Species-Fish on page 28, ALT B it states "Wet habitat would be managed to achieve potential or a strong upward trend within 15 years based on channel types and dimensions. Why does the statement on page 20 omit "or a strong upward trend?" Why aren't these statements consistent? Though a lofty goal, we question the feasibility of achieving that goal. Changes in channel types and dimensions are dependent more on environmental factors than on management activities. If the appropriate environmental conditions do not occur within that 15 year

time frame, you will not have streams that have the potential channels type or dimension.

**Response:** These inconsistencies have been corrected in the Proposed RMP/Final EIS and indicate that habitats would be managed “to achieve potential or an upward trend.”

- I2** **Comment:** On page 20 and 28, does anyone really think management can create that kind of channel change in 15 years? On Bureau of Reclamation land in Horse Prairie Creek that has been ungrazed for forty years, there has been no channel change.
- Response:** Not all streams respond the same. Different factors such as sediment loads and flows greatly influence the rate of change. It is expected under good management, to see the beginnings of improvements to channel type within 15 years. These statements will now read “...within 15 years or show an upward trend” to reflect that.

- I3** **Comment:** To a great extent fisheries habitat management direction is comprised of the *Western Montana Standards for Rangeland Health*. While these Standards are generally good and address stream channel hydrology, erosion/deposition, and stream bank vegetation, they do not appear to address aquatic habitat fragmentation and connectivity issues, nor do they fully address structure, composition and functions of aquatic ecosystems. Management direction is needed to maintain and restore habitat connectivity for fisheries and other aquatic life (e.g., fish passage through culverts, etc.), and to maintain and restore structure, composition and functions of aquatic ecosystems within historic ranges of variability.
- Response:** Alternatives B and C include additional stipulations directed at improving fish habitat. In many cases BLM has no control over connectivity and fragmentation issues. In almost all cases involving WCT in the DFO, habitat connectivity is not feasible or desirable due to the threat of hybridization from other streams.

- I4** **Comment:** We support the more timely habitat enhancements and achievement of upward trends in fisheries habitat within 10 years that is in Alternative C. It is estimated that WCT have a 90% chance of extirpation in Upper Missouri streams in the next 10 years. The BLM must consider this when choosing a management option. Greater emphasis must be placed on WCT restoration in the preferred alternative. The provisions in Alternative C to reduce or eliminate impacts on WCT streams should be added to the preferred alternative.
- Response:** All alternatives for fish have management actions to improve stream functionality. Due

to checkerboard ownership and historic use, full restoration of fish habitat within an entire drainage may not be possible. BLM is currently conducting stream assessments on a watershed level basis. As streams are assessed, management changes are implemented to improve stream functionality and improve WCT and other fisheries habitat where needed. It is likely based on the watershed assessment schedule that WCT streams in the DFO will have management actions placed on them to at a minimum result in an upward trend in habitat conditions within 10 years. Drought is a factor outside BLM’s control which will have a significant influence on how fast a given stream will respond to changes in management.

- I5** **Comment:** The management direction for Special Status Fish looks good (page 87 of the Draft RMP/EIS), although we suggest that our recommended direction to maintain and restore hydrologic connectivity and structure, composition and function of aquatic ecosystems would also be applicable here. Also, we support the timelier habitat enhancements and achievement of upward trends in fisheries habitat within 10 years and the other fisheries management direction in Alternative C.

**Response:** In many cases BLM has no control over connectivity and fragmentation issues. In nearly all cases involving WCT in the DFO, habitat connectivity is not feasible due to the threat of hybridization from other streams.

- I6** **Comment:** We are concerned with the apparent direction of tying overall land management in an area to a single species. This seems to be occurring in regard to management for sage grouse, westslope cutthroat trout, and bighorn sheep.

**Response:** WCT are a BLM “special status species”. This requires BLM to give special consideration to their habitat needs in any land management actions. BLM continues to manage for proper functioning condition of riparian areas, sagebrush steppe habitat, and rangeland upland health that benefit multiple species.

- I7** **Comment:** We ask that the BLM develop a plan to actually improve WCT habitat through addressing grazing and other activities. The provision to protect westslope cutthroat trout populations by adjusting use periods is simply a provision to essentially keep the status quo.

**Response:** There are several provisions in alternatives presented in the Draft RMP/EIS designed to protect and improve WCT habitat in addition to adjusting use periods. BLM believes that WCT habitat will be protected and/or improved given the provisions outlined in Alternative B.

**I8** **Comment:** The preferred alternative in the RMP does not comply with the conservation agreement and management plan for WSCT. The RMP hardly mentions the conservation agreement. The RMP also doesn't specify how it will meet the objectives of the conservation agreement.

**Response:** As stated on page 87 of the Draft RMP/EIS, BLM will follow the WCT conservation agreement and management plan as part of management common to all alternatives. **Appendix D** provides additional information on conservation actions most applicable to BLM.

**I9** **Comment:** Goals for riparian areas and wetlands in the preferred alternative are too modest (p. 35). We believe BLM can do better over the 20 year planning period than decreasing functional at risk habitat only from 59 percent to 30 percent, or increasing properly functioning habitat from only 18 percent to 50 percent. Certainly strengthening these goals with more aggressive management will increase the agencies ability to conserve and improve at-risk WSCT populations.

**Response:** These goals are the minimum. It is possible that under the preferred alternative we could expect greater improvement in riparian functionality with favorable climatic conditions. Historical use has resulted in current riparian and wetland conditions. Changes in functional condition of riparian and wetland areas can often take decades.

**I10** **Comment:** Conservation of Westslope Cutthroat Trout and protection and improvement of high quality wild populations of other trout species should be key elements in the preferred alternative. Unfortunately they are not.

**Response:** The conservation of westslope cutthroat trout and other fish species is deemed to be of very high importance in the RMP. Management actions from the selected alternative will enhance and preserve fishery habitat.

**I11** **Comment:** The draft RMP says that where fish habitat is found to be in less than PFC, habitat improvements would be initiated (p. 28). We agree this is a good idea. However, BLM should commit in the plan to specific targets, benchmarks, and priority watersheds through the plan period. Certainly plenty of habitat is already below PFC yet little restoration has been occurring. Nothing in the draft RMP indicates this will change. To better meet the intent of the conservation plan, BLM needs to offer concrete assurances and targets for habitat restoration.

**Response:** Habitat management actions for streams that do not meet the *Western Montana Standards*

for *Rangeland Health* are being implemented on a continuing basis to improve WCT and other fish habitat.

**I12** **Comment:** Nothing in the RMP for cutthroat conservation indicates BLM will do more than target the existing populations in the reaches they currently inhabit.

**Response:** BLM manages WCT habitat not populations. It is the responsibility of Montana FWP to initiate and implement any WCT reintroductions on lands within the state. BLM has no authority to initiate management actions on lands not administered by BLM. Once a WCT population is re-founded on public land, BLM will manage the occupied habitat to benefit that population. BLM will work with FWP to identify potential reintroduction areas on public land.

**I13** **Comment:** Land use management allowed in the preferred alternative (and even in the conceptual Westslope Cutthroat Trout ACEC) still assumes too much risk for the fish. For example, the limits for mineral activities simply are not adequate. We recommend that conservation populations of westslope cutthroat trout be protected by designating the existing and future connected habitat with a special protective designation, such as an ACEC or other category that will protect the populations until they are stable and increasing. Mineral and oil and gas activities should be prohibited within 300 feet of the normal high water mark—accounting also for channel migration zones—through mineral withdrawals. Certainly there should be no placer mining, gravel mining, pipelines or process facilities within this zone. This type of management direction would be consistent with the MOU and Conservation Agreement for westslope cutthroat trout.

**Response:** Alternative B (the Preferred Alternative) stipulations would be placed on oil and gas leases requiring No Surface Occupancy within + mile of 99-100% pure westslope cutthroat trout streams, and Controlled Surface Use stipulations on streams less than 99%. BLM is bound by federal law that guides mineral exploration and development. Designation of an ACEC provides no restrictions on mineral activities other than requiring a Plan of Operations be filed for operations causing surface disturbance greater than casual use. See the response to Comments C11, C12, C13 and O1 for more discussion.

**I14** **Comment:** Under Alternative C, grazing will be managed to prevent impacts to WCT spawning and fry emergence between April 15 and August 1. How will grazing use be adjusted to manage this? How



does the WCT ACEC address this issue? The preferred alternative fails to offer this safeguard for WCT.

**Response:** These areas will be protected by creating riparian pastures and using a pasture rotation system with use in the spawning areas deferred until after Aug 1. Under the preferred alternative 99%-100% WCT spawning areas will be protected. See page 75 of the *Fish* section of the Draft RMP/EIS.

**I15 Comment:** Were DFCs met in the last RMP for native fish? Desired Future Conditions should be chosen that can be reached in the shortest amount of time. With the potential for extirpation of WCT, this course of action must be followed.

**Response:** This is the DFO's first RMP. Desired Future Conditions have not been officially described before this plan.

**I16 Comment:** Table 12 directs the BLM to maintain suitable habitat for WCT in Sheep Creek tributaries and to improve habitat for "production of game fisheries" (p.75). What does this mean? Will both native and non-native fish be emphasized for this area? Does this increase the risk of hybridization?

**Response:** Only habitat occupied by WCT will be managed as WCT habitat. Other Sheep Creek tributaries will be managed for the species that occupy them.

**I17 Comment:** Table 12 also directs the BLM under all alternatives to "initiate habitat restoration on fishery streams that are not in proper functioning condition" (page 75). Many fish streams in the planning area are not properly functioning. It would be helpful to have a prioritization process for restoration. Native westslope cutthroat trout streams should receive first priority for restoration.

**Response:** We have added language to the Proposed RMP/Final EIS in both the *Fish* and *Special Status Species Fish* sections in Chapter 2 to identify BLM's prioritization process for fish habitat restoration. Habitat restoration/improvements for streams containing 99%-100% westslope cutthroat trout and arctic grayling habitat will receive top priority followed by westslope cutthroat trout streams with less than 99% purity and Class 1 streams.

**I18 Comment:** There are 135 miles of WCT streams >90% pure. Thirty-two pure populations are currently found within the planning area. BLM manages significant portions of habitat for 15 of these populations. All WCT streams >90% should be withdrawn from mineral entry. This is necessary to protect this imperiled fish.

**Response:** RMP decisions result in recommendations for areas to be withdrawn. Alternative B (the Preferred Alternative) recommends for withdrawal those areas the BLM believes cannot be adequately protected by existing laws, regulations and management practices that have a reasonable chance to be approved by the Secretary of Interior. We have not added the withdrawal provision from Alternative C to Alternative B in the Proposed RMP/Final EIS. BLM has the ability under regulations found at 43 CFR 3809 to protect resource values and prevent undue and unnecessary degradation by placing terms and conditions on operations that are not considered casual use.

**I19 Comment:** The DEIS states that management actions under Alternative B will lead to habitat impacts from sedimentation and that "setting a goal of 15 years for improvements may be inadequate to reverse or even maintain habitat that supports some existing populations" (p.306). Therefore, the timeline and measures outlined in Alternative C must be implemented to comply with environmental regulations and to protect westslope cutthroat trout. WCT are extremely vulnerable to further degradation or extinction and only Alternative C will enable the BLM to meet its fisheries goals.

**Response:** In some cases, WCT populations have declined to such an extent that they may not be recoverable in the long term. Long term drought, hybridization and recently wildfire, have severely impacted the habitat and numbers of WCT found in some streams. In cases like this it may take more time to recover the habitat than the fish themselves can endure, regardless of what we do and what time frame we do it in. We have lost several WCT populations during this last drought, simply because there was insufficient water in the streams for them to survive. Most WCT habitat is in fair to improving condition. As streams are assessed, management changes are implemented to improve stream functionality and improve WCT habitat. It is likely based on the watershed assessment schedule that the WCT streams in the DFO will have management actions placed on them to at a minimum result in an upward trend in habitat conditions within 10 years. Drought is a factor outside BLM's control which will have a significant influence on how fast a given stream will respond to changes in management.

**I20 Comment:** A management provision for special status fish species includes, "Initiate habitat restoration on special status species fishery streams that are Functioning at Risk (FAR) or Nonfunctional (NF)." [p.87] Have all special status species fish-



ery streams been surveyed? Are any of these streams WQLS streams? What is the timeline for habitat restoration?

**Response:** Surveys of streams in the DFO are being conducted on a yearly basis and inventory information updated. As surveys are completed and assessments made, changes are made where needed to improve fish habitat. There is no hard and fast timeline for habitat restoration. Not all streams respond at the same rate.

**I21 Comment:** The BLM should identify a goal to restore habitat for native fish. The two goals for fisheries are good, but don't specifically target native westslope cutthroat trout and grayling. Because the fisheries program will emphasize restoration for these species, it will help to have a goal and DFCs directing

**Response:** Goals for westslope cutthroat trout and arctic grayling are included in the *Special Status Species—Fish* section on page 87 of the Draft RMP/EIS.

**I22 Comment:** Fisheries Population Distribution, Size, Trend and Management – page 161. A total of 18 species are discussed under fisheries (4 native cold water fish, 4 introduced cold water resident game fish, and 10 non-games species) are discussed in this section. Absent from either the “fish” section or the rest of the Draft EIS is a thorough discussion of aquatic ecosystems. The choice to utilize an ecosystem management approach to the RMP requires the BLM Dillon Field Office to consider and manage the entire aquatic ecosystem, including things like aquatic plants, algae, water striders, macro and micro-invertebrates, etc.

**Response:** In general, if the standards for range-land health and water quality are met, the needs of algae, water bugs and plants will be met as well. Alternatives B and C have more management actions identified to provide for greater improvements in “aquatic” habitat.

**I23 Comment:** Fisheries Habitat Location and Condition - page 161. It is not clear to the reader exactly what the RMP proposes to manage. The text of this section discusses streams and fish, but the State of Montana owns the water, fish and the streambed. The Draft EIS fails to adequately disclose what the DFO will manage and by what authority.

The US Army Corp of Engineers (USACE) maintains a list of “navigable rivers.” However the existence of the USACE list does not infer any authority to the DFO nor is it responsive to the issue of ownership of the fish, water and streambeds by the State of Montana.

**Response:** This section simply describes what is in the field office area and what it looks like. BLM only manages the habitat adjacent to streams which may influence instream habitat conditions.

**I24 Comment:** As noted over a year ago, the last sentence of the paragraph on page 161 under *Fish Habitat Location and Condition* states, “On many streams, bank trampling and width-to-depth ratios are often excessive from long-term livestock use.” What appears to be the root cause of stream condition problems is not livestock grazing, but livestock grazing management. In the BLM Dillon Field Office, livestock grazing authority and management responsibilities lies not with the permittees, but are the responsibility of the professional land managers that develop Allotment Management Plans.

**Response:** As areas are identified that require improved livestock management, actions are implemented to improve, eliminate or at the least reduce the amount of impact to the stream banks. We would note that permittees are responsible for implementing the management prescribed in allotment plans.

**I25 Comment:** The DRMP/EIS proposes only unenforceable “goals” rather than the strong standards which are needed to protect riparian areas and fisheries. The DRMP indicates your desired future conditions (DFC) of improved riparian/fisheries habitat would not be achieved until twenty to fifty years out. The WCT and grayling (based on current trends) will likely be totally extirpated by that time. We maintain that it is painfully clear that the existing riparian area/fisheries conditions and your DRMP's proposed alternatives A, B, and D do not adequately comply with the CWA or State law; beneficial uses and water quality must be maintained, and if degraded, improved.

**Response:** While the DFC of a stream may take up to fifty or more years to be reached, it is expected that there will be significant improvement in the overall functionality of a given stream under the alternatives by requiring at the minimum an upward trend in 10-15 years.

**I26 Comment:** The DRMP/EIS discloses little meaningful information regarding the status of non-native but desirable fish populations, trends, and habitat conditions in streams not occupied by WCT. The State deems it's fisheries (native/non-native) to be a “significant resource” and a beneficial use. **Response:** The *Fish* section on page 75 of the Draft RMP/EIS identifies how BLM proposes to manage non-native fish habitat.

**I27** **Comment:** There is a lack of connectivity in West Slope Cutthroat Trout (WSCT) populations and protection of WSCT habitat. The proposed ACEC endeavors to protect West Slope Cutthroat Trout where they are 99% genetically pure and higher. The enclosed maps delineate 37 genetically pure populations, all isolated and of only a few individuals. The RMP proposes little more than adhering to a status quo and little of the additional conservation needed if the WSCT is to survive and thrive. The scope of the proposed actions will do little more than allow us to be the observer as each of these vulnerable populations wink out.

MWF asks DFO to reconsider this and develop responsible conservation measures that will extend beyond the existing populations in the reaches they inhabit. Land use management allowed in the Preferred Alternative still assumes too much risk for the endangered fish. Commit to specific targets and benchmarks and restore or at least improve habitats so that these distinct populations connect at some point in time in the future. Water quality conditions should be monitored and steps taken to mitigate those conditions not operating at PFC. Reduce grazing in sensitive tracts to conserve riparian areas necessary for restoration of trout habitat. Expand upon the current proposed ACEC to address mineral activities within 300 feet of the normal; high water mark is essential. Unless BLM commits to increasing numbers and lengths of stream reaches, especially in the persisting drought weather patterns, there will be no remnant populations to protect when the next RMP is being considered.

**Response:** In many cases BLM has no control over connectivity and fragmentation issues. In nearly all cases involving WCT in the DFO, habitat connectivity is not feasible or desirable due to the threat of hybridization from other streams. The BLM has no authority on lands not administered by BLM. The potential ACEC boundary is drawn as depicted since ACECs only contain areas of public land. Additionally, the BLM has no control over climatic conditions. Recent drought has been the biggest contributing factor to the loss of WCT populations and degradation of WCT habitat in the DFO in recent years. Also see the responses to Comments C11, C12, and C13.

**I28** **Comment:** My concern is the RMP plan's to give special consideration on the Axolotl Lakes Chain. How can you use the upper lake as a breeding pond for Arctic Grayling, which is an endangered species, and not give special consideration to a unique geological and ecological feature? I have sent you several letters regarding these lakes and have had

no specific response from your office regarding the status of the lakes or if you will consider adding special consideration to these lakes in your final draft RMP. So what are you going to do? Turn your lakes to these very special lakes that contain an endangered species of Trout of address the issue of special consideration and regulation that will support preservation of its "original ecological system?"

**Response:** The arctic grayling brood pond in the Axolotl Lakes area is known as "Upper Twin Lake" and does contain grayling from the Big Hole River stock. However, arctic grayling are not currently on the endangered species list. They are currently a candidate species. The lakes in the Axolotl area do not contain endangered or even native species of trout. The lakes contain rainbow trout and Yellowstone cutthroat trout. The Yellowstone cutthroat is not native to this area. It is native in the Yellowstone drainage only. There are currently no lakes in the area that contain native westslope cutthroat trout.

**I29** **Comment:** Provisions to protect the westslope cutthroat trout are unlikely to slow its slide into extinction. In particular, I ask that you ensure that entire stream segments suitable as cutthroat trout habitat be protected rather than only the disconnected stream segments as the draft proposes. Nothing less than a comprehensive restoration plan will offer this species much hope.

**Response:** BLM only has authority to manage land administered by the BLM. In many cases BLM only has management authority on a small segment of stream rather than the stream in whole. Where BLM controls management on the whole stream, it would have management actions in place throughout the entire length.

**I30** **Comment:** Separate segments of westslope cutthroat trout streams have been designated for protection rather than connected stream ecosystems. The treatment given these two "special status species" (westslope cutthroat trout and sage grouse) are among the plan's worst failings and would probably hasten the demise of both these species. Please rectify this!!

**Response:** BLM only has authority to manage public land administered by the BLM.

**I31** **Comment:** Fish: Alternative A is site-specific. I believe that site specific management is essential to the West Slope Cutthroat. Under this plan DFC will still be achieved.

**Response:** We believe Alternative B provides additional management actions that will better ben-

efit westslope cutthroat trout than Alternative A and have not changed the provisions in the Proposed RMP/Final EIS.

- I32** **Comment:** Page 48. The stipulations in Table 6 for arctic grayling and Westslope Cutthroat Trout (WCT) are not strict enough in Alternative B. The grayling should be a NSO of 1 mile preferred or at least NSO 1/2. WCT Habitat 99-100% should be NL 1 and WCT Habitat of 90% should be NSO (both as in alternative C). We believe these measures are essential to avoid unacceptable impacts on these sensitive.

**Response:** The stipulations for arctic grayling habitat have been adjusted in the Proposed RMP/Final EIS to No Surface Occupancy (NSO) for + mile to protect these habitats and for consistency with stipulations placed on 99-100% pure westslope cutthroat trout streams. CSU stipulations for westslope cutthroat trout habitats less than 99% pure provide adequate protection for these habitats, especially given the low development potential in these areas.

- I33** **Comment:** Page 75. Issue 2. Alternative B. Include fluvial and adfluvial grayling along with WCT (due to the concern and status given to protection of the grayling).

**Response:** BLM does not have management authority on any known habitats currently utilized by arctic grayling for spawning within the planning area. We have not added this specific suggested provision.

- I34** **Comment:** Page 75. Issue 2. Alternative B. The protection of only spawning areas is too narrowly focused. Should provide protection for entire stream (stipulations on page 48 appear to include entire stream).

**Response:** In most cases BLM does not have management authority for the whole stream. Prioritizing higher value areas for special consideration may help increase numbers on some streams where BLM only manages a small segment of stream. On streams where BLM has management authority on a larger segment of stream, spawning areas will be given special consideration. Improvement of WCT habitat in general will still have a very high priority.

- I35** **Comment:** The emphasis should be on streams designated by FWP as “priority” as well emphasizing WCT and grayling habitat. Priority streams are those identified by FWP in local areas as having special attributes needing attention. These are not necessarily the officially listed “blue ribbon” streams. Suggested wording for Alternative B

would be “Pursue water leasing and improved water management to benefit fisheries values in coordination with FWP for streams designated as priority and/or those with grayling and/or WCT habitat.” The rationale here is that if not all fisheries streams should receive proper water management and not just those with special status species.

**Response:** We appreciate this point, but due to very limited funding, BLM priority streams in the DFO will remain 99-100% pure WCT and arctic grayling first, followed by Class I and other lower priority streams. BLM would coordinate through FWP for “priority streams” identified by both the BLM and MT FWP first, followed by other streams.

- I36** **Comment:** Page 87. Issue 2. Alternative B does not appear to have restrictions as tight as noted in the stipulation on page 48. The requirements listed for this issue should apply to streams in general since habitat protection should apply to all fisheries streams. Also, we recommend you modify the wording from 100 feet to within the 100 year floodplain.

**Response:** Page 48 deals with oil and gas leasing stipulations. The management actions on page 87 that you refer to deal with locatable minerals such as gold. The wording currently reads “...takes place within 100 feet of the centerline...”. Due to the ambiguity of establishing a 100 year floodplain for project proposals, we have not altered the wording currently in the document.

- I37** **Comment:** The RMP should include measures allowing FWP participation in designing projects. Reverting conifer cover to deciduous cover could result in a change of fish species composition.

**Response:** FWP is routinely requested to participate in, and review, watershed assessments and proposed projects. Proposed riparian conifer treatments to restore willow/aspen communities would cover only small segments of stream with minor impacts on aquatic community composition.

- I38** **Comment:** Page 87. SSS-Fish section. Management Common to All Alternatives-bullet #4-Recommend you change wording to “Encourage . . . to reduce *fish* loss into irrigation ditches.”

**Response:** We have made the suggested change in the Proposed RMP/Final EIS.

## FOREST AND WOODLAND VEGETATION and FOREST PRODUCTS

- J1** **Comment:** Habitat fragmentation is detrimental to the grizzly, displacing their home ranges and possibly interfering with their use of natural food sources in the area. Alternative B clearly states that,

“Vegetation treatments that would occur in focus areas would increase habitat fragmentation by reducing patch size and adding temporary roads.” On the contrary, Alternative C maintains “250-acre blocks of unfragmented habitat within 6th HUCs during forest treatments.” Admittingly, the BLM has pointed out that Alternative B will increase habitat fragmentation, clearly making management actions included in Alternative C the only choice to protect grizzly habitat from increased habitat fragmentation.

**Response:** New roads associated with any forest vegetation treatment would be temporary as pointed out on page 280 of the Draft RMP/EIS. Such roads will be closed or reclaimed. In *Management Common to All Alternatives* the Draft RMP/EIS states on page 25 that existing recovery plans would be implemented and monitored for grizzly bears. The US Fish and Wildlife Service Grizzly Bear Recovery Plan which was revised in September 1993 notes: “Management of roads is the most powerful tool available to balance the needs of bears and other wildlife with the activities of humans.” (Appendix B, page 145 of the Recovery Plan). See the response to Comment AA49 for additional discussion.

**J2 Comment:** We believe the RMP should include management direction to protect and/or restore old growth or late seral stage habitats; retain adequate snags for wildlife habitat; and retain adequate coarse woody debris on the ground to maintain soil productivity and nutrient cycling during timber harvests. We support the retention of adequate snags for wildlife habitat. The RMP should assure that projects tiered to the RMP analyze and disclose impacts of management on snag habitat. The RMP should include direction for retention of snags for wildlife habitat to help restore these declining habitat characteristics. As noted in our comments on Soils we also believe RMP should include direction for adequate retention of coarse woody debris on the ground to maintain soil productivity and nutrient cycling. For example, “Maintain or restore snags and cavity habitat within historic range of variability to maintain or enhance habitat for cavity dependent species.”

**Response:** This level of detail is more suited to project level NEPA. Leaving adequate snag and coarse woody debris has been a project design feature on all forest vegetation projects for over 15 years in the DFO.

**J3 Comment:** We believe an RMP goal or DFC should be to bring the frequency, size, intensity, and severity of disturbance process such as fire, insects and disease to within the range of natural

or historic disturbance levels. We note that historic range of variability concepts may be more relevant at broad landscape scales rather than site specific scales. Management should be based on understanding and consideration of natural disturbance processes (e.g., fire, insects, disease), including the intensity, frequency, and magnitude of disturbance regimes; natural succession and disturbance regimes; and ecosystem processes (such as the flows and cycles of nutrients and water) and their dynamics. We also support proposed efforts to restore declining tree species such as aspen, Ponderosa pine, whitebark pine, etc, and to address conifer encroachment upon non forest habitat types.

**Response:** The Desired Future Condition for Forest and Woodland Vegetation can be found on page 30 of the Draft RMP/EIS. Restoration of natural forest disturbance systems to historic levels is restricted by other resource conflicts. For example the use of prescribed natural fire is often limited by weather, existing fuel conditions or other resource considerations that preclude allowing a fire to continue to burn. Also, our intermixed ownership often will not allow a fire to burn towards non-BLM ownerships that have differing land management objectives. The extent of insect and disease management actions may be limited by the unnatural levels of hazardous fuel buildup from decades of fire suppression. However, we are working to conduct forest health treatments to more closely approximate stand density that reflects historic fire return intervals. We are targeting aspen and white bark pine restoration and reducing conifer encroachment as priorities in the RMP. Ponderosa Pine does not occur in the Dillon Field Office.

**J4 Comment:** Page 30, Vegetation–Forests & Woodlands. While we are happy to see that BLM is taking steps to reduce encroachment and revive aspen stands, we feel that restricting cattle while taking no steps to reduce wildlife browsing is self-defeating. There is no discussion in the document about the need to protect these communities from big game browsing following removal of the conifer competition. Just the need to protect from livestock grazing (page 30). Our experience indicates that heavy ungulate browsing of aspen suckers suppresses the recovery following treatment. Fencing to eliminate big game in addition to livestock is normally required. This should be acknowledged in the EIS.

Also nothing is said about beavers. A current MSU study underway on aspen in the Centennial Valley had some interesting preliminary findings when comparing aspen stands on private grazing lands to those on federal lands, and were surprising enough to warrant more in-depth study. It's not



yet complete, but would bear watching before laying out hard and fast rules that would affect the next 20 years.

**Response:** We agree that browsing by wildlife can be a concern during aspen regeneration, however, BLM does not authorize wildlife use while we do authorize livestock grazing. Whether or not fencing would be required for exclusion purposes (the type, the height, etc.) would be determined in the site-specific analysis for the restoration project. The use of beaver to restore willow/aspen communities is an option if there exists sufficient amounts of these vegetation components to support beaver populations. The RMP provides for coordination with FWP to manage beaver where concerns have been identified regarding their presence or absence.

**J5 Comment:** We support protection of old growth habitats that maintain and restore large, native, late seral overstory trees and forest composition and structure within ranges of historic natural variability (e.g., Ponderosa pine). Old growth tree stands are ecologically diverse and provide good breeding and feeding habitat for many bird and animal species, which have a preference or dependence on old growth (e.g., barred owl, great gray owl, pileated woodpecker). Much old growth habitat has been lost. It is important that management direction prevent continued loss of this habitat and promote long term sustainability of old growth stands, and restore where possible the geographic extent and connectivity of old growth (e.g., using passive and active management such as avoiding harvest of large old growth trees, leaving healthy larger and older seral species trees, thinning and underburning to reduce fuel loads and ladder fuels in old growth while enhancing old growth characteristics). Private lands outside the federal land boundary have often not been managed for the late seral or old growth component, so federal lands may need to contribute more to the late seral component to compensate for the loss of this component on other land ownerships within an ecoregion. We did not see much information in the draft RMP and associated EIS regarding vegetation succession regimes (early, mid, late seral) relative to historic ranges at the broad landscape scale, and did not see management direction for protection or restoration of old growth or late seral stage habitats. We believe the RMP should include management direction to protect and/or restore old growth or late seral stage habitats within historic ranges of natural variability. In addition old growth should be defined (e.g., specify large tree age, trees/acres greater than certain DBH, old growth vary depending upon forest type, etc.). For example, “Maintain or restore old growth habitat within historic

range of variability to maintain or enhance habitat for old growth dependent species.”

**Response:** Old growth can be defined in a myriad of different ways. Because there is considerable variation in the definition, it was not our intention to either define or quantify it in this document, and we have removed the definition from the *Glossary*. We do believe that any definition should consider the types of stand structures that existed before natural disturbance processes were altered by fire suppression. The data pertaining to forest structures in Figure 3 on page 191 of the Draft RMP/EIS is based on 1990s satellite imagery. It shows 70% of Douglas fir group, 45% of the lodgepole pine group and 60% of the subalpine fir/Engelmann spruce group are in the “Gold” or mature size class. Forest stands that have old growth characteristics are included in this “Gold” category. We have added language to the *Vegetation—Forest and Woodlands* section to explain the characteristics of the class structures.

Alternatives B and D would emphasize restoring a Douglas-fir savannah structure of larger diameter stands (most of which have old growth characteristics) in the Douglas fir habitat types and managing lodgepole pine and subalpine fir stands to introduce more diversity of age classes and to reduce the spread of wildfire in remaining stands, especially near residences or other improvements. Also note on page 205 of the Draft RMP/EIS that since the early 1950’s a total of 5,000 acres has been affected by timber harvest on the DFO. This is a little over 3% of the forest stands. The remaining 97% of forest lands in the Dillon Field Office have large quantities of older forest. Of this, almost 45 % is in WSAs, which precludes any active management for wood products.

Completion of project level forest inventory for all forest vegetation types and incorporation of this data into the BLM’s Forest Vegetation System data base has been ongoing. With current funding levels, it is expected that this will be completed and in the electronic database well before the next planning cycle.

**J6 Comment:** The culprit for loss of the aspen is conifer encroachment and lack of disturbance. I have been involved in these kinds of projects in Idaho on the southside of the Centennial Mountains for over a decade. Livestock impact on treated areas was originally a big concern, but after experiencing the impacts of fencing these treated areas, this concern diminished. These fences are hard to maintain, expensive, and never seem to get rolled up. Our horses, cattle, and the wildlife have been tangled in these fences ever since they were constructed. Aspen regeneration prescriptions will



generally take place in areas where conifer encroachment has been significant. This is often on slopes and throughout the forests where ever aspen clones still survive, and not necessarily along riparian areas. The aspen treatments not only rejuvenate the aspen clones, the disturbance releases moisture used by the conifers and the herbaceous components of the area also increases. As long as these treatment areas are fairly large and well distributed, cattle will have little impact during the grazing season. There is enough grass during the grazing season that the cattle will generally not eat the sprouts and the cattle will not use these areas as much for shade because the trees providing the shade will be removed. Your prescription for removing cattle until sprouts are five feet tall is not necessary based on my experience. Most of the damage caused to the sprouts will be frost and late fall, winter and early spring use by deer, elk and moose.

**Response:** As shown on Table 12, page 91 of the Draft RMP/EIS, our intent is to treat aspen over a wide enough area so as to limit the need for fencing on a local basis.

**J7** **Comment:** Page 30, Vegetation—Forests and Woodlands. If BLM plans to concentrate on improving the wetland habitat in the Centennial as stated, they need to remember that the water table can best be improved by managing the forest better—not just the encroachment.

**Response:** The Draft RMP/EIS states that under all alternatives, Wilderness Study Areas will be managed according to the Interim Management Policy. The majority of forest lands in the Centennials are in the WSA. Prescribed fire and natural fire events will be the primary forest management tools available within this WSA for the foreseeable future.

**J8** **Comment:** The Jefferson River Watershed Council is currently working with your staff on a project in the Whitetail Basin to determine the affects of juniper encroachment on groundwater and stream flow. We support this project and congratulate you for partnering with Dr. Marlow of MSU to publish the results of the project. We encourage you to continue and increase the number and size of such projects on public lands.

**Response:** The Whitetail Basin project is located in the Butte Field Office. As noted on page 91, Table 12 of the Draft RMP/EIS, Alternatives B, C and D would implement some work in the warm and very dry habitats in which juniper encroachment has been recognized as a problem.

**J9** **Comment:** Areas Targeted for Harvest. The DEIS

identifies the southern Rubies, south Tobacco Roots and Barton/Alder Gulch areas as focal areas for timber harvest. In the final, please identify how these areas were selected and include the stand-specific inventories and information requested above.

**Response:** These areas were selected because they contain large quantities of warm dry habitat types with less documented use by sensitive, threatened or endangered species.

**J10** **Comment:** Forest Inventories/Old Growth. The DEIS commits the BLM to completing forest inventories by 2020 in Alternatives B and C. We are mystified as to why the BLM would take this long to complete an inventory that it should have completed for the RMP revision. This is simply unacceptable. It is critical that the BLM complete forest inventories as a part of the RMP revision. Otherwise, neither the agency nor the public has any understanding of the status of forest resources. We are particularly concerned about the status of old growth forests in the resource area, yet, there is no mention of how much old growth exists, where it exists, and what will be done to assure adequate quantity and quality of old growth will be protected from timber harvest in the RMP. At a minimum, the BLM must have a complete old growth survey and use that information to identify where old growth will be retained and which areas will be entered with management activities. Please assure that adequate old growth will be retained in the RMP and identify where those areas will be. The area-wide maps provided in the DEIS related to areas open to timber harvest are of little to no value in terms of trying to understanding age structure, condition and forest type. This information is the foundation by which the forest component should be built.

**Response:** BLM has used the best available data in the development of the Draft RMP/EIS. Also see the response to Comment J5.

**J11** **Comment:** I like the goal and DFC for Vegetation—Forest and Woodlands in the RMP. Make sure you go back far enough in history to establish the parameters for your DFC. Charles Kay from Utah State has done considerable work on this subject in the Centennials.

**Response:** As described on page 192 of the Draft RMP/EIS, we have looked at pre-European settlement as the baseline for DFC.

**J12** **Comment:** Whitebark pine is a critical food source for, among other species, grizzly bears. It is also under threat from blister rust. The BLM noted the presence of blister rust in some whitebark pine stands in the DEIS. However, it is important to note

that it takes up to 80 years for whitebark pine trees to start generating seeds. Therefore, what cone-producing trees remain are very important. We urge the BLM to avoid any kind of mechanical treatment in whitebark pine stands. To that end, we support this particular provision as stated in Alternative C.

**Response:** As described on pages 30 through 32 of the Draft RMP/EIS, it is our intention (where feasible) to utilize what ever tools are best suited to the successful regeneration of whitebark pine. We have not incorporated the provisions from Alternative C in Alternative B in the Proposed RMP/Final EIS to allow for management flexibility based on site-specific needs.

**J13 Comment:** Mechanical Treatment in WSA's. Alternative B contemplates mechanical treatment as part of implementing prescribed fire treatments in WSAs only if wilderness values are "enhanced." Alternative C disallows mechanical treatment in WSAs. We urge the BLM to incorporate Alternative C's provision regarding WSAs into the preferred alternative. Again, WSAs are areas where wilderness characteristics should be maintained, and mechanical treatment will only serve to degrade not only solitude but also clean water, healthy soils, old growth characteristics and secure wild-life habitat.

**Response:** Impacts to wilderness characteristics in WSA's from activities proposed under Alternative B have been considered and are described on pages 315 and 316 of the Draft RMP under the section *Wilderness Study Areas*.

**J14 Comment:** Timber harvest and lynx. We would like to see the BLM specifically address this issue in more detail. Specifically, we would like to see a map of lynx habitat components and identification of areas where timber harvest activities would have to be addressed regarding lynx and lynx habitat. This is an appropriate determination to make in an RMP revision. Otherwise, the public will have no 'big picture' understanding of the actions related to timber harvest and lynx habitat, and the BLM's area-wide response to this information.

**Response:** Please refer to Tables 56, 59, 62, and 65 of the Draft RMP/EIS for specific estimates of the percentage of lynx habitat that could be affected by forest vegetation treatments. These are also included in the Proposed RMP/Final EIS. Where proposed projects are located in identified lynx habitat, BLM will follow established procedures as described in the *Special Status Species* section on page 24 of the Draft RMP/EIS.

**J15 Comment:** Volume 1, Chapter 4, page 280. Forest Products. It is stated that all new roads are to be

restored. I take this to mean that the road prism is to be re-contoured to the original ground slope. This is a mistake! BLM must reserve to itself the option of leaving a road open when the need exists and to leave the road prism intact when future use of the road is anticipated. Closing the new road is correct to afford protection of resources. This closing can be done in many ways, all of which have been used successfully in the past. I suggest the following words be used: "New roads will be restored to natural contour when it is determined that future use of the road is not needed. All new roads will be closed to vehicle traffic unless it is determined to be in the public interest to allow year long or seasonal travel."

**Response:** The Draft RMP/EIS incorporated language suggested by the Western Montana Resource Advisory Council. After further review by the RAC concerning this issue, language in the Proposed RMP/Final EIS has been amended to read: "*New roads needed to remove wood products associated with forest treatments would be built and used only during the duration of the project then be closed or reclaimed.*" In this case the verb closed would be accomplished by placing a gate, rock, slash or other local material on the road so as to make it impassable while maintaining the road prism.

**J16 Comment:** We want to note that bark beetles are natives of the forest ecosystem and local endemic populations of beetles are a normal component of the ecosystem and beetle interaction with weakened trees is a normal ecosystem function. Bark beetles have a role in forest ecosystems of helping to remove older, weakened, less vigorous trees. It is our understanding that even large populations of bark beetles and resulting tree mortality can be part of normal ecosystem function. We recognize that much of the public perceives epidemic beetle populations as an unhealthy forest environment. However, beetle populations generally experience "boom and bust cycles, and forests have proven resilient, if not dependent on these cycles. A beetle epidemic may also be part of a natural progression to a new successional sere, thus, beetle attack is a natural disturbance and regeneration agent in the ecosystem. Many forests that have undergone "devastating" infestations are now experiencing regeneration without active management before or prior to the epidemic. While we do not oppose management to address bark beetle outbreaks for silvicultural purposes, we think it is important that the public understand that bark beetle outbreaks are a normal component of a forest ecosystem.

**Response:** The Draft RMP/EIS does not attempt to state that bark beetle populations are not part of the forest ecosystem (see page 192). We do ac-

knowledge that salvage harvest operations would be considered on all forest base acres since that is current BLM policy and direction.

- J17** **Comment:** Encroachment in the last 100 years has caused a loss of diversity and decreased the water yield in the water budget for lands under this RMP. The water quantity issue, as it relates to evapotranspiration by the brush, forest and woodland component of the resource and the interruption of the water cycle, will have a huge impact on the resource and economic uses that depend on water. Springs, riparian areas, irrigation needs, and instream flows all compete for a finite amount of water. The composition of the sagebrush and forest component of the resource directly relates to groundwater and stream flows.

**Response:** See the response to Comment Z7.

- J18** **Comment:** Aspen Regeneration. The DEIS reveals no information regarding the current condition of aspen in the resource area, other than broad generalizations. Without stand information, the public has no way of understanding the problems and where they are occurring. Also, we would like to see information regarding what balance of age classes of aspen the BLM is working toward and how that balance was determined, as this is apparently driving the amount of acreage targeted for regeneration. The DEIS also makes the statement that "Restoration efforts would be limited to small enough areas, even in focus areas, that the area-wide condition of aspen stands would not be significantly altered." (DEIS, p. 280). We are confused regarding the overall need to regenerate aspen, as the BLM has stated that its' work will have no effect on aspen stand condition. Please clarify in the final.

**Response:** The language on page 280 of Draft RMP/EIS pertains to the limited acres of aspen on BLM administered lands only. If we were to implement aspen restoration on the majority of aspen on BLM lands it would still only comprise a small portion of the total aspen occurrence across all ownerships.

- J19** **Comment:** Need to assess the effectiveness of past timber harvest. The DEIS states that approximately 5,000 acres have been either clearcut or partially cut in the past 50 years. In order to gain a better understanding of the effectiveness of these harvest methods on meeting plan goals, it is critical that the BLM assess the effectiveness of these previous timber harvests. Without that information, the BLM has no way to measure whether or not the level and method of timber harvest contemplated in any of the action alternatives will be successful.

**Response:** See the response to Comment J5 per-

taining to areas affected by timber harvest since the 1950s. We feel where we have implemented harvest practices we have established younger cohort stands that are generally meeting long term forest health goals.

- J20** **Comment:** The DRMP/EIS discloses that local or regional demand for sawlog products from the planning area has averaged a little over 1 million board feet/year (1MMBF/year). Alternatives B and D apparently propose to increase the PSQ substantially, which does not appear to be justified either by 'demand' or because the potential for, and existing significant adverse impacts to wildlife, native plants, watersheds and fisheries. We have questions regarding the completeness and accuracy of the PSQ and grazing disclosures made in the DRMP/EIS. While your DRMP/EIS states in Chapter 2 that the proposed PSQ for Alternative B is 3.6 MMBF, Chapter 4 apparently divulges that in reality that your "preferred alternative B's" PSQ will be approximately 6.6 MMBF (includes an additional 3.0 MMBF from "aspen restoration treatments." Alternative D in your DRMP/EIS Chapter 2 states that the yearly PSQ would be 5.9 MMBF, but Chapter 4 discloses instead that "aspen restoration and the associated declines in the [PSQ] from 9.6 MMBF to 5.9 MMBF, would likely occur within the life of the plan." The DRMP/EIS appears designed to confuse the actual PSQ issue rather than to "fully disclose" as required by law and federal court rulings.

**Response:** The Probable Sale Quantity (PSQ) is not a commitment of volume to be offered. We disagree that the EIS is attempting to confuse the actual PSQ. It breaks out the PSQ for conifer treatments and the additional short-term portion of the PSQ that would be associated with aspen treatments. This is full disclosure of expected PSQ at the RMP planning level.

- J21** **Comment:** The preferred Alternative B would increase production to 3.6 million board feet, while Alternative D proposes increasing production to 5.9 million board feet a year (see draft RMP, pages 38-39). The Draft RMP does not adequately address the potential impact of this increase in commercial logging on: relevant and important values in proposed ACECs, Sage Grouse populations, WCT populations, other wildlife values, or wilderness characteristics. TWS urges the BLM to take a closer look at potential impacts, and to manage commercial logging in such a way as to best protect the valuable wild and natural resources found in the DFO.

**Response:** Tables 56, 59, 62 and 65 in the Draft RMP/EIS (Tables 57, 61, 65, and 69 in the Pro-

posed RMP/Final EIS) identify by certain wildlife categories the estimated number of acres potentially affected by forest and woodland management and the resulting PSQ. Impacts from forest and woodland management and the resulting PSQ are also described throughout Chapter 4 in relevant sections (for example, see the *Fish and Wildlife* section on page 304 of the Draft RMP/EIS to see how sagebrush habitat is addressed). Commercial logging is not allowed within Wilderness Study Areas. With the exception of the Centennial Mountains and Blue Lake ACECs (both within WSAs) and the Everson Creek ACEC, the 13 potential ACECs contain limited to no commercial timber resources. Consideration of impacts to relevant and important values in any designated ACECs would be considered during activity-level planning. It has already been identified that special management could require relocation or redesign of projects and forest treatments that provide forest products (for instance, see page 336 of the Draft RMP/EIS).

- J22** **Comment:** Page 91, Issue 2. We appreciate the statement that timber acreages are upper limits rather than an absolute target. We encourage you to continue to involve our field biologists in the evaluation of proposed timber projects with adequate lead time for meaningful involvement.  
**Response:** We will continue to give local field biologists as much lead time as possible on forest vegetation treatment proposals.
- J23** **Comment:** Volume 1, Chapter 2, Table 12, page 101. Forest products. Include pine beetle in the statement about spruce budworm.  
**Response:** This has been added under the *Forest Products* section of Table 12 in the Proposed RMP/Final EIS.
- J24** **Comment:** Forested landscapes provide some of the best wildlife security for wide-ranging wildlife species using linkages on BLM lands (see Coniferous Forest Habitat assessment, p.163). Only a fraction of the Resource Area lands are forested and there is a significant timber pressure on these few areas; the preferred alternative proposes timber management on over 60% of these timbered lands. This will not adequately secure wildlife habitat. There should be no commercial timber harvest on these few acres of wildlife security habitat.  
**Response:** Table 59 on page 307 of the Draft RMP/EIS shows the estimated percentages of wildlife habitat that could be affected by the Preferred Alternative B. The percentage of elk winter range that could be affected is estimated to be less than 20% of the base acres and 10% of the forest lands in the entire field office. All estimated wildlife habitat

that could be affected is estimated to be 46% for the base acres and 24% for the entire field office over the 20-year life of the plan.

- J25** **Comment:** Why does Alternative B include maximization of unit size for Douglas-fir logging? Large clearcuts are known to impact many sensitive wildlife species. Alternative C's limit to < 40 acres with a minimum of 30% of standing dead trees is far more beneficial to wildlife.  
**Response:** Douglas-fir treatment unit size would be maximized within the limits of topography and stand size to enhance open forest habitat for dependent species as stated on page 21 of the Draft RMP/EIS. There would be no clearcutting in live and predominantly Douglas-fir stands (see page 31 of the Draft RMP/EIS). All Douglas-fir treatments in warm dry habitat type would be thinning from below. Treatments in cool moist Douglas-fir stand would be by selection cutting.
- J26** **Comment:** New Roads for Harvest. We appreciate the BLM's commitment that any new roads associated with forest treatments would be closed and rehabilitated after project completion. We strongly urge the BLM to first harvest timber from the existing road network, and to build temporary roads only as a last resort.  
**Response:** See the response to Comment J15.
- J27** **Comment:** Volume 1, Chapter 2, Table 12, page 100. Aspen treatments. Include in Alternative B all acres identified for treatment. This gives more flexibility to move to the Westside; thus the treatment areas will be spread over a greater geographical area, which in turn should lessen the impacts to other resources.  
**Response:** Aspen treatments are "primarily" located in the southern portion of the DFO. This does not preclude working on aspen in other portions of the field office, if only focuses it where there is the greatest concentrations of aspen. See page 91 of Table 12 of the Draft RMP/EIS.
- J28** **Comment:** Alternative B's logging limits "could displace big game use from fall and winter habitat" and adding "small sales of forest products to the same areas available for commercial harvest and forest health treatments may compound and extend disturbance in wildlife habitats over a longer period of time" (p.304). Logging will increase forage, but with such a small percentage of BLM lands in forested condition, forage is not what is needed in these areas. Forested security areas are far more important. For wildlife linkage, as well as individual special status species needs, wildlife provisions in alternative C must be chosen to adequately



protect and recover these species and their habitat. Although Alternative B contains some good wildlife linkage language and management tools, the “vegetation treatments that would occur in focus areas under this alternative would increase habitat fragmentation by reducing patch size and adding temporary roads” (p.305). This increased habitat fragmentation would cancel the effects of improving wildlife linkage. Regardless of the Alternative chosen, management direction and activities that would increase fragmentation must be removed to improve linkage on the Dillon Field Office.

**Response:** See the response to Comment J24.

**J29** **Comment:** The EIS states (page 303) that increasing production of forest products from 3,000 to 35,000 acres could affect fish habitat by increasing sedimentation and runoff from timber harvest activities. We note that increases in sedimentation to streams that are impaired by sediment (i.e., 303(d) listed streams) would be inconsistent with the Clean Water Act. As noted in a comment above under water quality, if sediment may be generated during project activities on 303(d) listed waters, mitigation or restoration activities should also be included to reduce existing sediment sources to offset or compensate for sediment generated during project activities. Recognizing uncertainties and desiring a margin of safety, such compensation should more than offset sediment generated, resulting in overall reductions in sedimentation levels in sediment impaired streams. Of course, once TMDLs are completed sediment reduction may also be necessary to meet TMDL requirements.

**Response:** As noted on the same page of the Draft RMP/EIS, such impacts would vary due to local conditions as well as installation of proper mitigation.

**J30** **Comment:** The preferred alternative estimates 3 million board feet of conifer wood products will be cut from areas around 12,000 acres of aspen stands. The alternative, however, fails to identify how aspen will regenerate. How does the BLM plan on regenerating aspen? Prescribed fire would best remove conifers and regenerate aspen.

**Response:** Treatments in the Preferred Alternative B would consist of a variety of mechanical, fire and other appropriate tools. We have added language to the *Vegetation—Forest and Woodlands* section of Table 12 in the Proposed RMP/Final EIS to clarify our intent.

**J31** **Comment:** We would like to see the ASQ lowered to the .7 mmbf mentioned in Alternative C. This ASQ is necessary to protect wildlife habitat and wildlife connectivity on BLM lands, most of which

are not timbered.

**Response:** We acknowledge that the management of forest vegetation has the potential to influence wildlife habitat and connectivity. See page 277 of the Draft RMP/EIS for discussion pertaining to impacts to wildlife habitat from management common to all alternatives, and page 304 for impacts more specifically associated with Alternative B.

**J32** **Comment:** The EIS proposes to harvest wood products to restore aspen stands and to continue long term conifer management on 23,000 additional acres within the planning unit. The EIS indicates that most of the aspen and long term conifer management will also occur in the three emphasis areas where the PSQ will supposedly be derived from. This appears to be a lot of activity proposed for just three areas. Is it realistic to think that all of the proposed activities can be accomplished without being constrained by other resource considerations?

**Response:** See response to Comment J9 and Comment J20. Also, please keep in mind that we are not held to mandated sale volume quantities. We acknowledge that other resources will create some constraints on forest vegetation treatments as described in Chapter 4 under impacts described in the *Management Common to All Alternatives* section.

**J33** **Comment:** Management under Alternative B would allow an increased amount of timber production than currently is allowed in the area. Timber production brings a great amount of disturbance on the land to wildlife, including logging roads. Of all four alternatives, B allows for the greatest increase in logging. This is not in accordance with managing the land to benefit all wildlife species, especially Special Status Species like the grizzly bear. Logging should be, if not decreased on the landscape, at least maintained at current levels to manage for wildlife, NOT increased as Alternative B allows.

**Response:** Please see Chapter 2, Table 12, page 91 of Draft RMP/EIS for acres that could be affected by forest vegetation treatments. The alternatives by decreasing relative magnitudes of acres potentially affected are Alternative D, Alternative B, Alternative C and Alternative A. Logging road concerns are addressed in the response to Comment J15.

**J34** **Comment:** Commercial thinning in lynx habitat will obviously have to adhere to guidelines noted in the Lynx Conservation Assessment and Strategy and Lynx Conservation Measures (page 44-Volume 2).



**Response:** Yes, as noted on page 25 of the Draft RMP/EIS.

**J35 Comment:** The draft plan puts forth an antiquated view of economic benefits our public lands can provide us. The goal of extracting forest products while contributing to the economic stability of the community, Page 100, chapter 2 of the draft, completely ignores information showing that mining, logging and oil and gas development are not a source of jobs or personal income, and have not been for three decades. Protected lands are the true positive predictor for economic growth and stability, not extractive industries. Protected lands especially in remote western counties is Protected public lands are one of the key factors to a strong local economy. Madison and Beaverhead Counties have all the other key factors, but lack in protected public lands. Please see the enclosed report entitled *Prosperity in the 21st Century West*.

**Response:** The Dillon Field Office acknowledges the relatively minor direct economic role of the harvest of forest products since the early 1980's. See information provided in the *Economics* section on pages 246 through 248 of the Draft RMP/EIS. While jobs associated with this activity have declined, they still play an important role to those directly involved. See also the response to Comment G7 in the *Economics* section.

**J36 Comment:** We request that the process include consideration of the negative impacts that proposed motorized road and trail closures will have on fire management, fuel wood harvest for home heating, and timber management.

**Response:** The *Forest Products* sections in Chapter 4, pages 309, 324, and 336 of the Draft RMP/EIS identify impacts pertaining to firewood access. The ability to travel as necessary for administrative and emergency fire situations as identified in **Appendix I** precludes impacts on fire and timber management. Motorized cross-country travel may be allowed in conjunction with personal use permits such as firewood and Christmas tree cutting if specifically provided on the permit, or identified as an area exception on the Southwest Montana Interagency Visitor/Travel Map.

**J37 Comment:** Let us haul off the dead and diseased trees.

**Response:** Sections on *Forest Products* and *Vegetation—Forest and Woodlands* presented in Chapter 2 of the Draft RMP/EIS identify how timber harvest would be managed.

**J38 Comment:** The Probable Sale Quantity as discussed on page 39 and in other places in the EIS

seems to be improbable. If the PSQ is based on a harvest level that does not consider all environmental factors, then it will never be attained when those other factors are considered.

**Response:** As stated on page 39 of the Draft RMP/EIS and based on Washington Office planning guidance, a PSQ is not a commitment to cut to a specific level of timber volume. It recognizes a level of uncertainty in meeting the identified level. However, in order to take into account some of the known factors at the land use planning level, some resource constraints were factored into the calculations for the PSQ. Some of these include State of Montana BMPs, elk study guidelines, westslope cutthroat trout buffers, partial cut techniques in Douglas-fir habitat types, non-harvest in young stands, etc. The effort at the land use plan scale was not designed to accurately project what may occur at the project level once site-specific analysis is undertaken.

## IMPLEMENTATION, MONITORING and ADAPTIVE MANAGEMENT

**K1 Comment:** Implementation Costs – Disclosure of expected implementation costs in staff and budget requirements would allow the public to make cost/benefit analysis that would help them make a better-informed decision on the various alternatives.

**Response:** As discussed on page 243 of the Draft RMP/EIS, staff levels are expected to be maintained but not necessarily increase over the life of the plan. CEQ regulations found at 40 CFR 1502.23 do not require such an analysis and in fact state that the merits and drawbacks of various alternatives should not be displayed in a monetary cost-benefit analysis when there are important qualitative considerations. BLM believes that there are important qualitative considerations in selecting an Approved RMP. Implementation of the Approved Plan will drive DFO budget requests in the future for operational funding, contracts, etc.

**K2 Comment:** Ongoing County participation during the implementation of the plan will be critical to minimize conflicts with co-adjacent landowners and to maximize consistency with the County plans in the long term. Both Counties intend to participate with the BLM in this process, and desire to execute an MOU regarding this process. Similarly, County involvement in monitoring, evaluation, and adjustment of the selected alternative and related implementation actions will be critical in the long term to achieving consistency between the plans, and in the actions that implement the same. Significant BLM participation, input, and consultation with the Counties in county plan revision and

local implementation actions will also facilitate longterm consistency with local land use resource and planning objectives. This approach will also encourage good effective management of the ecosystem, not just lands within BLM jurisdiction.

**Response:** BLM intends to continue to work with County officials as we move toward implementation of the RMP after the plan is approved.

**K3** **Comment:** It is widely recognized in the range management literature that monitoring is the key to a successful range management program. The draft RMP discussed this monitoring at the landscape analysis level and also at the AMP level. We also request annual monitoring to assess year to year range conditions. We would also like to see the details of the stream stability monitoring protocol, including the frequency and intensity with which it will be utilized, especially as it applies to WCT streams.

**Response:** Monitoring of range conditions is ongoing and is guided by established BLM protocols and conducted as part of the watershed assessment process. The Approved Plan will include an implementation and monitoring schedule for the plan and a monitoring section by program and identified goal, but resource monitoring protocols are not RMP level decisions.

**K4** **Comment:** We believe the RMP and EIS should include some direction for watershed/water quality assessment and monitoring programs for evaluation of watershed and riparian restoration success and achievement of proper functioning condition and beneficial use support (i.e., Water Quality Standards compliance).

**Response:** See responses to Comments Z1 and Z3 in the *Water* section.

**K5** **Comment:** It would be appropriate to revise the discussion of water quality parameters on pages 88 and 89 of Appendix G (Rangeland Health Standards) to include the multiple indicator approach that the MDEQ and EPA uses for evaluating beneficial use support to account for complexity of chemical, physical and biologic processes, and potential lack of certainty regarding the effectiveness of a single indicator. It is likely that these indicators and parameters will be incorporated into TMDLs by the Montana DEQ.

**Response:** The Standards for Rangeland Health presented in **Appendix G** were developed by the Western Montana Resource Advisory Council and are not being modified in the land use planning process.

**K6** **Comment:** We believe additional information on monitoring and assessment and adaptive management programs should be provided to better show how monitoring and adaptive management is used both on a programmatic basis and with implementation of site-specific tiered projects. While the RMP states that adaptive management will be incorporated across the alternatives as a process of monitoring, evaluation, and incorporating new and changing information into the ongoing management of resources (page 17), we did not see much information or management direction regarding monitoring or adaptive management. Monitoring and adaptive management programs are necessary and crucial elements in identifying and understanding the impacts of management actions, and should be an integral part of RMP implementation.

**Response:** The Approved Plan will include an implementation and monitoring schedule for the plan and a monitoring section by program and identified goals. However, resource monitoring protocols are not RMP level decisions. We have added an appendix to the Proposed RMP/Final EIS that discusses implementation, monitoring and adaptive management in a general sense. The Approved RMP, which will accompany issuance of the Record of Decision, will include a monitoring section by program and identified goals.

**K7** **Comment:** We feel that an Adaptive Ecosystem Management program could hold promise for many areas in the RMP, especially where there is little current data at this point upon which to make long-term decisions. We request that the final RMP outline how the BLM will incorporate use of the AEM process into implementation of the RMP. We would like to see in the FEIS a provision for adaptive management based on annual and semi-regular monitoring (such as the watershed assessments) and evaluation, particularly where livestock impact water quality. The adaptive management process is critical to incorporate into the RMP process as it allows the BLM to respond to on the ground resource conditions.

**Response:** We have added a section in the Proposed RMP/Final EIS (**Appendix S**) that describes the implementation of the plan, plan monitoring, and the incorporation of adaptive management. The Approved RMP, which will accompany issuance of the Record of Decision, will include a monitoring section by program and identified goals.

**K8** **Comment:** We believe the RMP and EIS should include a strong, explicit commitment to monitoring, especially watershed/water quality monitoring, such as that in the Forest Service Pacific North-

west Region's Forest Monitoring and Evaluation Guide in which the Regional Forester stated, "All programs and projects should contain appropriate levels of monitoring funds in their costs or they should not be undertaken." (USDA FS 1993). EPA supports linking the approval of projects tiered to the RMP to availability of funding for conducting necessary monitoring and evaluation.

**Response:** Implementation and effectiveness monitoring is ongoing and is guided by established BLM protocols and conducted as part of the watershed assessment process. The Approved Plan will include an implementation and monitoring schedule for the plan and a monitoring section by program and identified goals.

- K9** **Comment:** The achievement of Water Quality Standards for activities that generate nonpoint source pollution occurs through the implementation of BMPs, and although BMPs should be designed to protect water quality, they need to be monitored to verify their effectiveness. If found ineffective, the BMPs need to be revised, and impacts mitigated. It is through the iterative process of developing and implementing BMPs and mitigation measures, and monitoring effectiveness of BMPs and mitigation measures, with adjustment of measures where necessary, that Water Quality Standards are achieved. Also, the success of watershed and riparian restoration is dependent on monitoring programs that measure and evaluate progress toward achievement of restoration goals.
- Response:** We have added appendices to the Proposed RMP/Final EIS regarding Best Management Practices and how they will be used (**Appendix Q**) and Implementation, Monitoring and Adaptive Management (**Appendix S**). Please see the response to Comment K8 for additional discussion on monitoring.

- K10** **Comment:** The Counties asked if the biological monitoring process have sufficient resolution to differentiate separate activities (ie: livestock, wildlife, recreation, etc.), use levels (light, moderate, heavy), the climate (i.e., cycles in precipitation and temperature) and determine each activity's cause/effect relationships and how those activities impact on public land resources?
- Response:** As we have discussed on numerous occasions with representatives from both Counties, all activities and uses are considered in the watershed evaluation process when determining appropriate management changes for activities authorized by BLM. It is difficult to differentiate between livestock and wildlife use at times so we rely on seasonal use monitoring to differentiate between these uses. Biological monitoring is able

to differentiate between recreation and other uses, as well as use levels and climatic variation.

- K11** **Comment:** Monitoring should be conducted in all ACECs for the particular values that are being protected.

**Response:** Monitoring will be outlined in the Approved Plan for designated ACECs as well as for other resource programs

- K12** **Comment:** To the Counties, an adequate monitoring system is a basic issue of fairness, one of procedural and substantive due process and a necessary part of the RMP. Monitoring is how the DFO "knows" what is happening and communicates this information to other agencies and the public. It also represents the DFO's institutional memory. The Commissioners believe an adequate monitoring system would have the following characteristics:

- consider climactic conditions such as rainfall and drought
- accurately apportion impacts among all the various users
- evaluate effectiveness of management actions at achieving RMP goals and objectives
- evaluate effectiveness of mitigation
- provide a feedback loop to improve future management
- provide an early warning to identify issues while they are still small and easy to manage.

Adequate monitoring is as important as implementation as it helps ensure management direction is effective. The Commissioners are concerned about what are perceived as inadequacies with the current monitoring system. The Commissioners are concerned that the current system is attributing impacts to and sanctioning users/uses for impacts for which others are responsible. A review of the effectiveness of the MFP was not conducted to determine what was implemented/not implemented and which management actions and mitigation were effective/not effective. This would seem to be useful information in framing the RMP issues. As noted elsewhere, not all activities or uses on the DFO are monitored. The Commissioners remain concerned that the current monitoring system in attributing impacts to and sanctioning users/uses for impacts for which others are responsible. Whatever monitoring data are in DFO files becomes irrelevant because of the decision not to use the monitoring data for this analysis. There are no references or citations of any DFO monitoring data or reports. Its exclusion in this process casts doubt on the utility of its continued use for site specific planning.

Sufficient, long term, credible biological monitoring data means:

- Appropriate documentation and monumentation of the sample measurement sites
- Use of accepted field techniques to ensure the samples are not tainted
- Develop a systematic sample design, usually grid/transect, true random site selection or representative site selection.
- Adequate sample size (n) based on the population size (N), standard deviation ( $\sigma$ ) and p-value.
- Correct statement of the Null (H0) and Alternative Hypothesis (H1)  
H0 – Data show no relationship between the variables (Default)  
H1 – Data show a relationship between the variables (To be Proven)
- A reasonable and consistent p-value. In many areas of research, the p-value of .05 is customarily treated as a “border-line acceptable” error level.
- Use of large sample sizes to prove significance of small relations
- Determination if there is a “Normal Distribution” of test data
- Interpretation of the values of correlations using r values (correlation coefficient) to express significance and r<sup>2</sup> values (coefficient of determination) to express the strength of the relationship
- A quantitative approach to dealing with outliers, i.e.: range of  $\pm 2$  standard deviations
- The use of casewise (vs. pairwise) deletion of missing data when possible

The Commissioners have noted there are no references to DFO monitoring data/reports in the Draft EIS and would request an explanation in the RMP as to why the monitoring was not appropriate to use at this level of planning, but is suitable for and is still in use for site specific planning.

**Response:** The BLM has procedures in place (which were explained to the Counties’ planning team representative and at numerous meetings with the Commissioners) for monitoring the condition of upland and riparian areas and will utilize those procedures when determining the condition of public lands. Many of these same concerns have been previously addressed in correspondence to the Counties dated May 27, 2003, and in subsequent joint meetings between BLM and the Commissioners.

We are unclear as to the ascertainment that BLM decided not to use monitoring data in this analysis. When available, monitoring data was used to assist in describing the existing condition and trend in many portions of Chapter 3—Affected Environment. Site specific monitoring data is used during the watershed analysis process to determine results

of past actions and to determine if objectives are being accomplished. There was no decision not to use monitoring data; for some programs, however, there is limited quantitative monitoring data.

#### K13

**Comment:** Effectiveness Review of the Management Framework Plan – There was no review of the effectiveness of the MFP management actions and decisions, either for implementation/non-implementation and/or effective/ineffective of the various MFP decisions and management actions. The effectiveness review is important feedback to the ID Team, the public and the decision maker the ability to critically review past management actions and incorporate that knowledge into the RMP EIS process.

**Response:** A review of the MFP was completed in 1991 to determine the level of implementation that had been achieved and the validity of decisions. These findings were reviewed by staff in 2001 as they conducted an analysis of the management situation, portions of which were incorporated into Chapter 3 of the EIS, as well as considered during alternative development.

#### K14

**Comment:** The Draft RMP/EIS does not adopt an adaptive management land-use planning approach. None of the alternatives outlined in the Draft use an adaptive approach. The “Adaptive Management” section in Chapter 2, page 17, of the draft states that adaptive management “will be incorporated across the alternatives as a process of monitoring, evaluating, and incorporating new and changing information into the on-going management of resources. However, none of the alternatives discuss how or what management prescriptions will be changed as conditions change. Using computer programming vernacular, adaptive management provides “if X, then Y” management prescription scenarios. No such language is found in this document. Moreover with the including of management prescriptions such as 7" herbaceous cover and 10" emergent vegetation, the BLM is effectively nullifying any attempts to use adaptive management. A majority of private landowners manage and plan land use for private land based on adaptive management. Because BLM and private land ownerships are commonly intermixed and adjacent, BLM must consider the private landowners management and direction plans in a given area. However, in BLM’s ecosystem approach, the private landowner’s management information does not appear to be known or considered. In light of the ongoing drought in the planning area, adaptive management could be a powerful land management tool to the BLM. It is senseless to abandon it.

**Response:** The impression that BLM has aban-



done adaptive management is incorrect. We have added a section to the Proposed RMP/Final EIS on implementation (**Appendix S**) that further clarifies our use of adaptive management once a plan is approved. You are correct in noting that at the land use plan level, we have not specified prescriptive scenarios of “if X, then Y”. We have adjusted language regarding the 7” herbaceous cover to clarify our intent to consider that as one of many objectives contained in the Montana Statewide Sage Grouse Conservation Strategies, contingent on site-specific conditions and capabilities.

## INVASIVE SPECIES and NOXIOUS WEEDS (1720)

**L1 Comment:** The BLM does little to no weed control on public land roads.

**Response:** The BLM treats on an average 1,418 acres of weeds with chemicals annually. Most of these acres are associated with roads. The BLM has approximately 2,173 miles of roads on BLM and it is estimated that 30 to 40 percent of these roads are covered annually by weed crews funded by BLM.

**L2 Comment:** The transport mechanism for noxious weeds includes all visitors and uses of public lands including hikers, equestrians, and cattle grazing in addition to motorized recreationists. For the most part, vehicles do not have a surface texture that will pick up and hold noxious weed seeds. Transport mechanisms based on hair, fur, manure, shoes, and fabrics are far more effective than the smooth metal and plastic surfaces found on vehicles.

**Response:** All of the methods mentioned by the commenter do transport weed seeds as recognized on page 194 of the Draft RMP/EIS. There are studies that have documented that vehicle travel routes provide the most and fastest areas of weed infestation spread. While it is true that the smooth metal and plastic surfaced do not generally hold weeds seeds, vehicles have many areas of the undercarriage, frame, joints and adhered mud that will transport weed seeds. The state wide Weed Management Plan as well as County and Field Office weed management plans address all methods of weed prevention and control. The BLM applies all methodologies and programs to the prevention, detection, eradication and control of noxious weeds. One program that is applied cooperatively by the Federal, State and County is a very active weed education program to help prevent the spread of noxious weeds and control existing infestations.

**L3 Comment:** Without the ability to use aerial application (as proposed in Alternative C) the weed problem will continue to grow. The cost of ground

application will increase to \$350/acre from \$32/acre for aerial application. Eliminating aerial application could also result in possibly eliminating the special status species that you are trying to protect as noxious weeds invade.

**Response:** As noted on page 323 of the Draft RMP/EIS, the cost of weed control would significantly increase. The increased cost of ground application in the pygmy rabbit, sage grouse breeding, mountain mahogany and special status plant areas would significantly reduce the amount of control that could be accomplished. Spot treatment using backpacks or vehicle mounted equipment is approximately 10 times the cost of aerial application. We have not included a prohibition on aerial application in Alternative B. However impacts to resource values will be considered and mitigated where aerial spray projects are proposed.

**L4 Comment:** Toxicity of herbicides as associated with Montana water quality. It is noted that weed control chemicals can be toxic and have the potential to be transported to surface or ground water following application. The continual herbicide spraying program’s adverse impacts on amphibians, other sensitive species, and sensitive plants require that you must take a hard look at those effects.

**Response:** The BLM follows all requirements and recommendations as outlined on pesticide labels. The use of these chemicals and their affect on the environment has been analyzed in two programmatic EIS’s as listed on page 11 of the document. These EIS’s were the Vegetation Treatment on BLM Lands in Thirteen Western States and the Northwest Noxious Weed Control Program Final EIS. These documents adequately address the use of pesticides on BLM lands. The BLM uses the direction and protocols of these documents and the pesticide labels to provide for proper application of pesticides and safety to the workers and environment. The BLM will continue to tier to programmatic documents in the future. Across all alternatives, the RMP states that noxious weeds will be managed according to the principles of integrated pest management, where any and all tools that are effective in the control and/or eradication of weeds will be used. BLM will continue to use herbicides where appropriate to control weeds as well as the other tools available in an integrated approach.

**L5 Comment:** The DRMP provides no discussion on the current distribution, severity, or impact of noxious weeds on lands managed by the BLM - Dillon Field Office.

**Response:** Additional information has been in-



cluded in the Chapter 3 *Vegetation* section of the Proposed RMP/Final EIS about the extent of weed infestations on BLM lands and the amount of control work that is being done.

**L6** **Comment:** We recommend that you emphasize that any hay used to feed livestock on BLM land, whether involving commercial or private operations, be required to be certified “weed free.”

**Response:** Certified weed seed free feeds and mulches are required on all federal and state lands in Montana. The DFO was the first office to require weed seed free feed in Montana in 1989 and the remaining BLM lands in Montana required weed seed free products in 1996.

**L7** **Comment:** Several comments indicated that the Draft RMP/EIS addresses weed management only with herbicides or aerial spraying, there are no weed management specifics, there is no weed planning, and there is not plan for dealing with other categories of weeds.

**Response:** Chapter 2 (page 33) of the Draft RMP/EIS contains information on the weed management plans that are currently being followed. The DFO has a weed management plan that tiers to these plans and outlines our site specific management. These plans incorporate the basic principles of Integrated Pest Management, also described in the Draft RMP/EIS. Our weed management is fully directed at all categories of weeds whether state or federally listed, but must be prioritized due to limited budgetary and human resources. The application of weed control methodologies incorporates the consideration and mitigation for various resources and programs such as sensitive species.

**L8** **Comment:** Prescribed fire has the potential to stimulate weed growth (e.g., Dalmatian toadflax or leafy spurge), and can destroy insects planted for biological weed control. Burning followed by application of appropriate herbicides can provide effective weed control.

**Response:** Weeds will respond aggressively following fire due to their adaptability and lack of other vegetation competition. This will be especially true for wildfires. It is BLM practice to seed following fires where it is necessary to reestablish native species and provide competition for invasive species. Funding for weed detection, control and monitoring is available for three years following a wildfire. Wildfire will also destroy insect populations when the insects are active or when they are dormant and the fire is intense enough to scorch the soil. Controlled burns are designed to be low intensity and during insect dormancy periods and so do not affect the insect populations.

There are examples of using burning and herbicides for weed control which has proven to be very effective and uses much less chemical. The DFO could use this practice in appropriate locations.

**L9** **Comment:** The Draft EIS fails to adequately consider and disclose how the various Conservation Strategies, and Special Status Species management actions will impact (adversely affect) the control of cheatgrass and noxious weeds.

**Response:** The sections disclosing impacts to Invasives and Noxious Weeds in the *Vegetation* section of Chapter 4 of the Draft RMP/EIS do recognize the increased cost of management and control that special stipulations may result in. We have added a statement in the *Impacts Common to All Alternatives* section addressing concerns about management actions that limit effective weed control.

**L10** **Comment:** Noxious weed infestations are significantly affecting large areas of the Dillon Field Office. The RMP fails to consider reasonable alternatives that initiate meaningful management controls on off-highway vehicle use, grazing levels and turnout dates, road building, and logging to prevent continual weed spread. Depending mainly on herbicide spraying will not maintain natural ecological processes or protect sensitive plants and animal species.

**Response:** Across all alternatives, the RMP states that noxious weeds will be managed according to the principles of integrated pest management, where any and all tools that are effective in the control and/or eradication of weeds will be used. BLM will continue to use herbicides to control weeds as well as the other tools available in an integrated approach. The argument that we have not placed enough emphasis on the control of weeds but that BLM should limit use of an effective tool such as herbicide spraying is not consistent. We also disagree that meaningful management has not been included in the plan. As a result of the Statewide OHV EIS, motorized travel is currently limited to existing routes, and the alternatives presented in the Draft RMP further limit travel to the routes designated by that alternative. Consideration of weeds was included in one of the principles established by the Travel Management subgroup convened under the Western Montana RAC as they developed Alternative B. Herbicides are applied according to label instructions, which reduces or eliminates impacts to water sources and organisms (such as amphibians) that depend on them. Alternative B also includes a management action to ensure protection of special status species is considered, especially in proposals for aerial applications.

Decisions on grazing levels and turnout dates are not land use plan decisions and are outside the scope of this RMP.

## LANDS AND REALTY, including ACCESS and LAND OWNERSHIP ADJUSTMENTS

**M1** **Comment:** There is no mention in the Draft RMP/EIS or any other planning related documents (i.e. the NOI) that the RMP will recognize valid existing rights. The BLM is required to recognize valid existing rights. See BLM Manual 1601.06G.

**Response:** While there is reference to recognizing valid existing rights in certain specific sections of the Draft RMP/EIS such as the discussion of alternatives for land use authorizations in the *Lands and Realty* section on pages 40 and 41, we agree that this is an important general concept that should be clearly stated. We have added language to the *Planning Criteria and Legislative Constraints* section in Chapter 1 indicating that all decisions made in land use plans, and subsequent implementation decisions, will be subject to valid existing rights.

**M2** **Comment:** You never mentioned an inventory of illegal posting of public land is needed and citations will be given by BLM cops. That is what we pay them to do.

**Response:** The Draft RMP/EIS does not mention this very specific type of inventory and the issuing of citations since this is considered to be part of the agency's day-to-day administration rather than details to be discussed within the broad management scope of an RMP. However, under the *Lands And Realty* section, Volume I, the Draft RMP/EIS does address agency plans to deal with this and other types of realty-related unauthorized use in general terms on page 40 under the "Management Common to All Alternatives" portion of "Land Use Authorizations". Inventories and law enforcement are certainly some of the tools that can be used to accomplish the plan's stated objective of abating unauthorized use through prevention, detection, and resolution.

**M3** **Comment:** We request that any routes proposed for closure and in existence before 1976 be considered as having R.S. 2477 rights-of-way in order to provide citizens with access to public lands. This section should mention research into R.S. 2477.

**Response:** We are aware of R.S. 2477 and its implications, and have added the following language to the *Travel Management and OHV Use* section in Chapter 2 to clarify how R.S. 2477 will be considered:

No regulations currently exist to either assert

or recognize R.S. 2477 rights-of-way. It is beyond the scope of this document to recognize or reject R.S. 2477 assertions, and this issue is not addressed further. At such time as a decision is made on R.S. 2477 assertions, BLM will adjust its travel routes accordingly, if necessary.

**M4** **Comment:** You mentioned "willing landowners" would provide public and administrative access. Most of the access problems are associated with "unwilling landowners" and out of state landowners. BLM needs to take a more aggressive approach on the access issue including "condemnation" if necessary and work with and obtain information on the problems with sportsmen and sportsmen's groups.

**Response:** We have adjusted Alternative B to allow for the exercise of the right of eminent domain to secure access to public lands. The exercise of such a right would be limited to access purposes only and could only be used as an option of last resort. While such a right may never be exercised during the life of the subject plan, we believe it is important that we not tie our hands by stating that we would never exercise this inherent governmental right when necessary for the good of the public at large. On another note, the BLM considers the information provided by sportsmen and sportsmen's groups in regard to access and other land management issues to be of utmost importance. These groups have been consulted during the development of the Draft RMP/EIS. We intend on continuing to seek the knowledge and opinions of these groups with regard to these important access and land management issues during implementation of the land use plan.

**M5** **Comment:** Private property owners that border public land should not benefit from public land without providing access to the public. Any private landowner that owns land that borders public land and does not provide public access to that public land should also be denied access to that public land under the principles of fairness and reciprocity.

**Response:** See the response to Comment T23.

**M6** **Comment:** The elimination of public access to public lands through private property has contributed to the loss of motorized access and motorized recreation opportunities. We request that agencies acquire private land and rights-of-ways to provide access to public land that is now blocked off to the public.

**Response:** The Dillon Field Office shares the public's concern with the lack of legal access to certain areas of public lands. The goal statement

in the *Access* section page 43 of the Draft RMP/EIS indicates that it is our intention to acquire and maintain access to public lands where needed. Under the *Management Common to All Alternatives* section on this same page, we list the various means by which we would seek to acquire access, including easement acquisition and several different types of land ownership adjustment.

**M7** **Comment:** Roads and trails needed for public access should have been identified on maps similar to the Southwest Montana recreation maps. This would include access to the east side of the Tendoy Mountains (Bell Canyon, Limekiln Canyon, McKenzie Canyon), Lima Peaks (Dutch Hollow), Hogback area south of the Big Hole River, Centennial Mountains, north and east side of the Ruby Range, Henneberry Ridge, Bear Gulch and Everson Creek near the Montana-Idaho boundary, Jeff Davis Creek near China Town, BLM public land surrounding Lima Reservoir, Frying Pan Gulch, and the long list goes on.

**Response:** As described on pages 43 and 44 in the *Access* section of the Draft RMP/EIS, acquisition efforts for easements for public use would focus on routes designated as “open” for travel that lack legal public access. A list of specific routes was not developed in the RMP, especially given the ever evolving access situation as a result of Block Management programs, new landowners, etc., but many of the areas mentioned above would become a focus for acquisition dependent on the routes designated as open in the selected alternative. The commenter should note that the “recreation” maps referred to in use in the 1980s and early 1990s are no longer kept current or distributed and are not considered official BLM maps.

**M8** **Comment:** The access discussion on page 43 of the document is totally inadequate. BLM should have described the serious public land access problems in SW Montana. Public land access was glossed over with no specific areas with problems identified or any proposals to gain public access. There should have been specific areas and problems identified on large-scale maps and in the draft. Public land access is becoming more restrictive each year and much has been precipitated with out-of-state landowners purchasing ranches and blocking public land access to all public lands including state land and National Forest in southwest Montana. Real estate and BLM’s own land exchange and pooling program have contributed to the problem and are part of the problem.

**Response:** The BLM is very aware of public land access issues in southwestern Montana and specifically notes the fact that access is a concern to

both the agency and the public on page 208 in Chapter 3 of the Draft RMP/EIS where the affected environment is described under the *Access* section. The *Access* section in Chapter 2 (Alternatives) provides very succinct direction to acquire access over non-Federal lands to reach public lands lacking adequate access using all the various methods available. The commenter and others interested in access may also want to review the *Land Ownership Adjustment* section of Chapter 2 and the *General Acquisition Criteria* in **Appendix F** since land ownership adjustment would provide a key means by which legal access to public lands could be secured. Facilitating access to public lands and resources is the first acquisition criteria listed in **Appendix F**. Four different access alternatives (proposals) are presented in this same chapter. Rather than viewing land exchanges and other types of land ownership adjustments as part of the access problem, the BLM views land ownership adjustments as an opportunity and one important means by which the agency can help improve access by acquiring lands or interests in lands for access and helping to consolidate the fragmented land ownership patterns which often complicate public access. Note that the *Land Ownership Adjustment* section on page 41 of the Draft RMP/EIS indicates that public access would be maintained or improved in all land ownership adjustments.

**M9** **Comment:** The access problem at Sodak Mill is a good example of the overall access problem. A private out-of-state landowner with a small amount of private land is trying to block access to large blocks of public land and the Big Hole River. Make a decision now and make a new road around the private tract and connect to the existing public road. Include in Alternatives A, B, C and D.

**Response:** The Dillon Field Office has been working with the private landowner and interested members of the public to resolve this access issue. This type of issue is addressed in a site-specific analysis, not in this land use plan.

**M10** **Comment:** Anytime there is a land exchange between private and public entities, a public access easement or right-of-way should be required in order to offset the trend of less public access to public land over the past 35+ years and the cumulative negative impact of that trend on multiple use recreation.

**Response:** Pages 41 and 43 of the Draft RMP/EIS contain provisions to ensure that access to public lands is not jeopardized as a result of land ownership adjustments such as exchanges. While we do not foresee requiring every exchange proponent to furnish an access easement (since not every situa-

tion would lend itself to this requirement), we would be looking at negotiating for access provisions in those exchanges where it is deemed appropriate.

**M11 Comment:** The map for example “Land adjustment Categories” identifies solid block public lands for disposal south of Lima with 100% public access from the highway. Those sagebrush hills are important hunting areas for pronghorn antelope and mule deer.

**Response:** There are two maps in the Draft RMP/EIS that deal with land ownership adjustment. Map 23 portrays land ownership adjustment categories under Alternative A—the No Action Alternative—and does show several blocks of land south and east of Lima which lie outside of a retention zone, and therefore, would be available for the full range of land adjustment opportunities. Alternative A portrays the existing management situation. Map 24 shows the land adjustment categories proposed for Alternatives B, C, and D and includes blocked public lands located south of Lima in Category 2. Category 2 lands would be managed for retention, not for disposal, as described on pages 42 and 43 of the Draft RMP/EIS, with only limited land ownership adjustment. Disposal of any parcel of public land in a land ownership adjustment action would be subject to the requirements of the National Environmental Policy Act of 1969 along with extensive public review and comment.

**M12 Comment:** The following lands should be placed in Category 1 (Retention) to ensure lands with high resource values are retained in federal ownership:

1. All ACEC's
2. Lands identified by American Wildlands as Corridors of Life program.
3. Any land bordering National Forest Land. If any such land is placed in Category 2 or 3 and proposed for disposal, the Final EIS should require that appropriate conservation easements be obtained for any parcels that are placed in private ownership.
4. Any land within, bordering or within one mile of the Red Rocks National Wildlife Executive Order Boundary.
5. Any land, which includes habitat for Threatened, Endangered, Federal Candidate species or Sensitive fish and wildlife habitats.
6. All wetlands and riparian habitat and designated floodplains. If any wetlands are placed in category 2 or 3, the Bureau should retain wetlands in Federal ownership unless Federal, State, public and private institutions, and parties have demonstrated the ability to maintain, restore, and protect wetlands and riparian habi-

tats on a continuous basis (BLM Manual 6740).

7. Crucial winter range for big game should be retained.
8. Strutting/dancing and nesting grounds for sage grouse should be maintained in public ownership.
9. Land adjacent to rivers eligible for designation under the National Wild and Scenic Rivers Act should remain in public ownership.
10. Existing and potential nesting areas for sensitive species or significant nesting complexes for nonsensitive species.

The General Acquisition Criteria in Appendix F should be adjusted to include specific lands as priorities:

1. Inholdings within WSA's and ACEC's.
2. Any lands which are referenced in numbers 1, 3-8 above.

**Response:** BLM lands in the categories listed above generally fall within Category 2 (although portions fall into Category 1). Category 2 lands are to be retained as described on pages 42 and 43 of the Draft RMP/EIS, although limited land ownership adjustment could occur. This category gives the BLM the ability to retain the lands described above and protect the resources mentioned, but still provides some flexibility to engage in occasional land ownership adjustments that are clearly in the public interest. For instance, there may be certain BLM parcels adjacent to National Forest System Lands or the Red Rocks National Wildlife Refuge that might be better managed by those respective agencies because of the particular land pattern or other circumstances could potentially be transferred to those agencies under Category 2 management, but not under management associated with Category 1. With respect to floodplains and wetlands, the BLM is required to comply with Executive Order No. 11990, Protection of Wetlands, and Executive Order No. 11988, Floodplain Management, when engaging in land ownership adjustments such as exchanges and sales in order to protect the integrity of these important areas.

The General Acquisition Criteria in **Appendix F** gives the agency the flexibility to potentially acquire the types of land listed in this comment if such actions were considered to be in the public interest without specifying values or tracts of lands.

**M13 Comment:** The following adjustments regarding Category 2 (Retention/Limited Adjustment) should be made to ensure that lands with high resource values are retained in federal ownership:

1. The final ROD should state that: No land within the Centennial Valley Conservation Easement Program area should be disposed of,



- unless an appropriate conservation easement is obtained as part of the transaction.
2. Exchanges which allow the Fish and Wildlife Service to obtain lands with the Red Rocks boundary should be given preference.
  3. For any disposal of wetlands, the patent should contain restrictions and conditions that ensure the patentee can maintain, restore, and protect the wetlands on a continuous basis.
  4. Public lands within or adjacent to Montana Fish, Wildlife and Parks habitat management units should be considered for incorporation into the F,W&P units before they are otherwise disposed of.
  5. Any disposal proposal should consider impacts on Native American cultural resources.

**Response:** Including a prescriptive statement as suggested for the Centennial Valley area would limit BLM's flexibility in addressing new and emerging issues or opportunities in that area. The Draft RMP/EIS as written gives BLM the ability to enter into land ownership adjustments that would benefit the Red Rocks Lakes National Wildlife Refuge and Montana Fish, Wildlife and Parks. However, we believe that giving preference to land ownership adjustments that would benefit these two agencies could limit our flexibility in accomplishing realty transactions that would benefit other agencies and be of benefit to a host of different resources in other portions of the Dillon Field Office as well as elsewhere in the State of Montana. In terms of conservation easements in the Centennial Valley, the consideration of wetland and Native American cultural resource issues are required by law and Executive Order.

**M14 Comment:** The BLM went way out of their way to list public land they would like to "rid us" in the "Lands-Realty" section but listed nothing anywhere on specific areas needing public land access. See pages 79-83 of Volume 11. ALL public land must be retained in public ownership I mean ALL OF IT! Selling public land so the buyer can block access to the public land including state land and National Forest is unjustified. The money from the sales goes to the U.S. Treasury and does not benefit public land management. BLM continues to appraise our land low so the recipient will receive more acreage and/or dollars to makeup the difference. We need a moratorium on any sales and exchanges. You have used this section in an attempt to justify and increase trading away and selling our public lands such as wildlife habitat and public hunting areas south of Lima. Not one acre of public BLM lands should be sold or traded away. Our land only increases in value through retention of all of it.

**Response:** Under Alternative B (the Preferred Alternative), less than one percent of the planning area would be identified for disposal in Land Ownership Adjustment Category 3. The remainder of the planning area would either be in Category 1 (retention) or Category 2 (retention with limited land ownership adjustment). The Draft RMP/EIS follows national and State-level planning direction by 1) specifically listing legal descriptions of tracts that could potentially be sold pursuant to Section 203 of FLPMA (although land exchange is the preferred means of disposal), and 2) developing land acquisition criteria rather than listing legal descriptions of specific tracts for acquisition. As for appraisals, the BLM uses and would continue to use fully qualified Department of Interior or contract appraisers who follow established professional industry and federal standards in order to determine value.

**M15 Comment:** The criteria requested for Category 2 lands (see Comment M13) should apply to lands in Category 3 as well. In addition, the following adjustments should be made to Category 3 (Disposal) to ensure that lands with high resource values are retained in federal ownership.

In addition to a preference for exchanges instead of sales, the Final ROD should:

- 1) Reflect that preference for disposal of scattered, smaller parcels will be given to proposals which include placing appropriate conservation easements on the transferred parcel.
- 2) For any parcels proposed for disposal to allow for existing community expansion, that such expansion is consistent with the local planning and/zoning standards and objectives.
- 3) Any disposal proposals developed in the Centennial Valley (the area from Red Rock Pass to Monida and from the Idaho border to Township 12 South) should be developed in collaboration with the US Fish and Wildlife Service.
- 4) Any disposal proposal should consider the potential and cumulative impacts on possible development of nearby lands currently owned by the Montana DNRC and identified for rural residential development.

**Response:** The Final ROD will not add provisions for the four specific items listed above for the following reasons:

- 1) Parcels are listed as Category 3 lands because initial analysis indicates that they are best suited for disposal. If further site-specific analysis indicates that is the case, encumbrances will be kept to a minimum in accordance with advice from the Field Solicitor regarding conveyance of public land. While the

BLM may negotiate for the placement of a conservation easement on an occasional parcel prior to transfer, the agency believes that it is best to leave these decisions to the subsequent landowners;

- 2) Each land ownership adjustment is a unique action subject to negotiation with the proponent as well as public review. Consistency with other planning and zoning efforts would be one of the items that the BLM would need to address during the analysis of such an action.
- 3) If disposals in the Centennial Valley were to be proposed, agencies such as the US Fish and Wildlife Service, Montana Fish, Wildlife, and Parks, and other agencies and landowners in this general area would be consulted as part of our required procedure for developing and processing these actions;
- 4) These types of potential and cumulative impacts would be considered through the analysis and documentation process required by the National Environmental Policy Act.

As indicated on in the discussion of Category 3 lands on page 43 of Chapter 2 of the Draft RMP/EIS, it is possible that some lands in this category may contain significant resource values protected by law or policy. If actions could not be taken to adequately mitigate impacts from disposal of these lands, these tracts would be retained. See the response to Comment M13 for reasons why the criteria suggested for Category 2 and 3 lands will not be added.

**M16** **Comment:** When the BLM has land for sale I think it should only be fair for all individuals to have a right to the land. I understand why land locked pieces are offered to the adjacent landowner. However, when parcels of land are available through public access, these parcels should be offered to the general public. We would all like to own a piece of the rock. This was not done on land that was sold during a purchase on the Blackfoot River. There were several parcels around this area that were offered and sold to adjacent landowners. When I asked the Missoula office about being able to purchase parcels, I was told they would be sold to adjacent landowners first and if any were left the public would be notified. I asked to be put on the list for notification and never have heard another word from them.

**Response:** This comment addresses the manner in which certain land ownership adjustments are implemented rather than the broad land ownership adjustment proposals discussed in the Draft EIS/RMP. Each public land sale or land exchange is unique with its own set of circumstances. In certain situations, the BLM does make disposal par-

cels available to the general public. Pages 77 and 78 of **Appendix F** of the Draft RMP/EIS provides an overview on methods and manner of disposal of public lands utilizing sales and land exchanges. More detailed information can be obtained by consulting the regulations at 43 CFR 2710 (Sales) and 43 CFR 2200 (Exchanges).

**M17** **Comment:** Lands which are to be transferred or otherwise not retained need to receive Section 106 consideration prior to approval, or conditions need to be attached that Section 106 responsibilities would be met by the receiving agency.

**Response:** Compliance with Section 106 of the National Historic Preservation Act of 1966 is a standard part of the BLM's procedure in processing land ownership adjustments such as exchanges and sales.

**M18** **Comment:** Land Ownership Adjustment. The Draft RMP/EIS indicates on page 42 of Chapter 2 that for land ownership adjustment purposes, newly acquired lands obtained with LWCF funding and lands acquired within or adjacent to special management areas would be designated as Category 1 lands and managed accordingly (no disposal). All other newly acquired lands would be designated and managed as Category 2 lands (where disposal could occur). Make sure that land acquired is land that the BLM wants to keep.

**Response:** Lands that the BLM would acquire and place in Category 2 would be managed for retention with only limited land ownership adjustment. It would be rare to acquire lands and later dispose of all or a portion of them in a subsequent land ownership adjustment. However, placing certain newly acquired lands in Category 2 would give the BLM some added flexibility to be able to adapt to changing resource conditions and priorities in the years to come. Occasionally the BLM acquires a smaller portion of less valuable resource land along with a much larger portion of land that has high resource values because the entity the agency is negotiating with is opposed to splitting the parcel up and conveying only a portion of it. In situations such as this, the BLM might later find itself in a situation where it could exchange the low value resource land for other lands containing important wildlife habitat, valuable recreation land, or other high value resource lands having greater public benefit.

**M19** **Comment:** We suggest that the Barton Gulch site near the Ruby Reservoir, Jim McBee's property in Bell Canyon, and Trudeau Warm Spring be acquired by the BLM through land exchange or other means for their important resource values.

**Response:** Suggestions to consider site specific land ownership adjustment proposals are beyond the scope of the RMP. The Draft RMP/EIS provide “General Acquisition Criteria” on pages 78 and 79 of **Appendix F**.

**M20 Comment:** There are several parcels of land identified as Category 3 lands within the areas designated for wildlife connectivity on Map 3. We would like the BLM to reconsider lands in the Virginia City area and Gravelly/Centennial corridors to be taken out of this category. Though the parcels are small and isolated, their development could greatly impact wildlife movement in these key corridors. Alternative C best protects these and other public land values by retaining all BLM lands.

**Response:** Personnel in the Dillon Field Office, including the wildlife biologist, have discussed this comment. DFO wildlife staff indicate that these parcels are so relatively small, scattered, open and distant enough from other public lands that their value for wildlife movement is limited. These parcels will remain in Category 3 with land exchange the preferred means of adjustment. There could be opportunities to exchange these parcels for non-Federal lands that are adjacent to existing Federal lands and are of even higher value to wildlife movement or wildlife in general.

## LIVESTOCK GRAZING

**N1 Comment:** I think that there should be more emphasis on specific sites and allotments and more interest in trends.

**Response:** This document is a broad based plan covering the analysis area. Site specific planning will be done on the watershed basis. Trend information has been and will be used as it is available and applies.

**N2 Comment:** The Draft EIS fails to disclose the previously discussed cumulative or disproportionate impacts to livestock grazing in the Centennial Valley.

**Response:** Impacts to livestock grazing are disclosed in Chapter 4 of the Draft RMP/EIS on pages 295, 310, 324-325, 337 and 346, based on estimates of what could occur with implementation of any given alternative. The impacts described in the Economic and Social sections also estimate impacts to livestock operators and people/groups that value livestock grazing on public lands. As we have previously discussed with the Commissioners at many joint meetings, impacts to specific allotments or grazing operators are not disclosed as those decisions are not being made in this land use plan.

Those analyses are made during site-specific assessment and planning.

**N3 Comment:** The authors of this RMP used a blanket 7" herbaceous height in breeding habitat with the majority of the area being in a >15% brush canopy cover (Class 4 and 5) with at least a 30% canopy cover of grasses and forbs. The authors are blindly following some guideline that truly does not fit our area and will result in removing livestock use with no substantial benefit to the sage grouse. A 7" requirement is an abuse of the WAFWA Guidelines. A 7" requirement would virtually eliminate livestock grazing.

**Response:** See the response to Comments S11 and AA29.

**N4 Comment:** After looking at the “Errata Notice” mailed to me I noticed differences in the table and other information provided to me regarding the Bryan Allotment.

**Response:** The differences between the table mailed out as part of the Draft RMP/EIS and information obtained for the Bryan allotment has been noted. That allotment transferred after the data was prepared (data was frozen in May 2002 for use in the Draft RMP/EIS). There will continue to be changes to data over time as the RMP is implemented. We have not included an updated livestock allotment table in the Proposed RMP/Final EIS as it continues to change every few months as transfers are approved and other site-specific decisions are made.

**N5 Comment:** Land treatment projects of BLM have always been “quick fix” techniques to avoid facing the real issue improper livestock grazing management programs.

**Response:** Land treatment projects are considered following site-specific analysis during the watershed process and are designed to enhance the resources for multiple uses.

**N6 Comment:** On page 89 of Appendix G. The sixth bullet under Common Indicators of Water Quality, second sentence, please add Livestock grazing to the list of sources.

**Response:** **Appendix G** merely restates the *Standards for Rangeland Health and Guidelines for Livestock Grazing* that were developed by the Western Montana RAC and published in August of 1997. They will not be changed in this document.

**N7 Comment:** Standards for Rangeland Health and Guidelines for Livestock Grazing apply to all resource uses and need to be implemented.

**Response:** The Standards for Rangeland Health do apply to all uses and all uses are evaluated during the watershed analysis process. The assessment takes into consideration all past and current activities and well as climatic conditions.

- N8** **Comment:** Grazing can be beneficial to a plant community and can help enhance special plant species. Grazing on BLM lands should be looked at as a tool to be used to enhance and enrich BLM lands.

**Response:** Livestock grazing is used as a tool for habitat manipulation and enhancement. It is recognized that the two primary “natural” disturbances that influence vegetative communities in the planning area are fire and herbivory.

- N9** **Comment:** We would like to see in the final EIS a consideration of the cumulative impacts of grazing and associated management activities on water quality, soil conservation, ecosystem integrity, and fuel load. Grazing can result in the proliferation of annual plant species more fire-prone than naturally occurring biennials and perennials.

**Response:** Cumulative impacts are described in the Draft RMP/EIS on pages 343–350. The cumulative impacts to water, soils, vegetative communities and fire management/fuels are all described in this section.

- N10** **Comment:** The Draft RMP/EIS is too often “single issue” driven. Livestock grazing should be given equal consideration as other resources.

**Response:** The planning process is issue driven and there were eight issues identified in the scoping process for this effort. They drive the development of the document. Resource uses or values that effect these issues are discussed in the analysis. As pointed out throughout the document the BLM manages for multiple use and livestock grazing is one of those uses. We feel that this use is given appropriate consideration in the DRMP/EIS.

- N11** **Comment:** We support some of the wildlife provisions in Alternative C, and ask that they be included in the preferred alternative.

**Response:** We have adjusted Alternative B in the Proposed RMP/Final EIS to include a provision that no new or converted sheep permits would be authorized in wildlife dispersal/corridor areas. We have not included the other options of Alternative C as including the suggestions would limit BLM’s flexibility to manage to accommodate site specific conditions.

- N12** **Comment:** Everywhere else in the west, the BLM has often evaluated whether certain lands are suit-

able or not for livestock grazing because of fragile soils, steep terrain, degraded riparian areas, sensitive vegetation, lack of water, or other irreconcilable conditions. Making such determinations is a plan level decision. It is our understanding that the grazing suitability determinations for the RMP were last made as part of the Foothills EIS in the early 1980s. If this is the case, then it is critical that the BLM update its’ suitability determinations for the RMP. The Dillon plan needs to evaluate suitability of BLM lands for grazing livestock, at this writing, these lands are not suitable, the soils and vegetation are fragile and are at risk. BLM needs to revisit its criteria for grazing suitability.

**Response:** The BLM planning guidance requires that we designate those lands that are available or not available for livestock grazing which we have done. Suitability adjustments were made during the development of the Mountain Foothills EIS and were based on slope, distance to water, rock outcrops, timbered sites and soil erodability. Other than small changes in the amount of timbered sites and possibly distance to water, these conditions do not change over time so we did not re-calculate suitability adjustments as part of the planning process.

It is also suggested that current resource conditions may render lands as unsuitable for grazing. Degraded riparian areas and habitats that do not provide for the needs of sensitive plant species are not meeting the standards for rangeland health and would require a change in management, not a change in the suitability category. These areas will be identified as part of the watershed assessment process and changes in management will be identified to correct the conditions. If changes in management cannot correct the problem while still allowing for livestock grazing, these lands would become unavailable for grazing through plan maintenance.

- N13** **Comment:** Throughout the Draft EIS, we have noted sentences such as, “Livestock grazing is a major influence on <important resource>. Livestock grazing impacts to <important resource> will be minimized by <additional restrictions>. The Commissioners note that, generally speaking, there is no basis for these statements in the Draft EIS. The computer model SIMPPLLE was used for vegetation impact analysis and it included livestock grazing as one of the factors analyzed. The results of the SIMPPLLE modeling run do not support these statements.

**Response:** The Draft RMP/EIS discusses conditions of resources beyond vegetative resources, which was the focus of the SIMPPLLE model. While this level of planning (the land use plan scale) does not enable discussion of specifics, there



- are resources that are impacted by livestock use, as well as other factors.
- N14** **Comment:** We are particularly concerned about the effects that domestic sheep have in relation to bighorn sheep populations, especially in the Tendoy and the Greenhorn mountains. We would like to see a detailed plan in the final RMP to assure that the BLM is taking appropriate steps to limit sheep grazing in areas with viable bighorn sheep populations.  
**Response:** See the response to Comment AA46.
- N15** **Comment:** Since sage grouse populations have declined at the same time that numbers of cattle grazing on public grounds have decreased, we believe that there is a correlation between cattle grazing and sage grouse numbers.  
**Response:** Research (Connelly) and data (FWP) indicates that the primary loss of sage grouse is during nesting and early brood rearing and is dependent on the available hiding cover. There is little direct experimental evidence linking grazing practices to population levels. However, since grass height and cover affect sage grouse nest site selection and success, the evidence would suggest that grazing by herbivores that significantly reduces this cover may have a negative impact on sage grouse populations (Connelly et al).
- N16** **Comment:** We are concerned with implications of the statement "...but in order to meet the proposed timeframe, actions focusing on reducing the duration of riparian impacts, such as limiting grazing treatments to less than 30 days, would be necessary." Hopefully, if BLM plans to limit the duration of grazing, they also plan to increase the density.  
**Response:** The timing, intensity and duration of grazing for riparian areas will be developed during the site specific watershed analysis process and be designed to meet the site specific objectives developed for the riparian area.
- N17** **Comment:** We are concerned that the dEIS has not disclosed the type, location, and number of the various "range improvements". We also did not see any analysis in the dEIS regarding the effects of domestic grazing activities on allotments with habitat for threatened, endangered, and sensitive species.  
**Response:** Specific structural or nonstructural projects will be developed during the site specific watershed analysis process. Impacts to threatened, endangered, and sensitive species is found throughout Chapter 4.
- N18** **Comment:** We believe the overall goal for livestock grazing should be amended to incorporate the concept that desired structure and diversity should be maintained or enhanced and that riparian function, water quality, and aquatic habitat should be protected and/or restored.  
**Response:** Vegetation structure and diversity is included in the description of the indicators of range-land health in both the upland and riparian standard. These indicators can be found in **Appendix G**.
- N19** **Comment:** Under Alternative C, grazing will be managed to prevent impacts to WCT spawning and fry emergence between April 15 and August 1. How will grazing use be adjusted to manage this?  
**Response:** The protection of WCT spawning habitat will be managed through the use of riparian pastures or enclosures, or modification of the season of use to avoid spawning and fry emergence. The development and use of these tools will be outlined during the watershed analysis process.
- N20** **Comment:** The DEIS for the Dillon Resource Management Plan fails to disclose any of the direct, indirect, or cumulative impacts associated with domestic livestock grazing from the proposed management direction in any of the analyzed alternatives.  
**Response:** The impacts to various resources from livestock, including cumulative impacts, are disclosed in Chapter 4 of the Draft RMP/EIS. Impacts from livestock grazing have also been disclosed in other documents such as the Mountain Foothills Grazing EIS, and national level grazing EISs.
- N21** **Comment:** Despite their extent, sagebrush-dominated communities are among North America's most critically endangered ecosystems as a consequence of losses to agriculture, conversions to exotic annuals, and/or degradation due to excessive grazing by domestic livestock.  
**Response:** See the response to Comments N33, S13, and AA23.
- N22** **Comment:** BLM should think long and hard before eliminating sheep grazing, one of the most useful tools for managing weeds and forage. It does not make sense to arbitrarily rule out sheep when you would be better off retaining the ability to make decisions as the situation and conditions warrant.  
**Response:** Sheep grazing is not being eliminated and existing permits would not be terminated. Existing sheep permits would be continued and adjustments would be made if the opportunity arises where the potential exists to have conflicts with

threatened or endangered species. This would be to reduce the potential of a “taking” under the Endangered Species Act.

**N23** **Comment:** If livestock-grazing management is contributing to the decline in condition of streams in the DFO, we would suggest the Resource Management Plan implement innovative and/or superior grazing management practices. The Draft EIS fails to adequately disclose why the DFO continues to require grazing management that is not perceived as beneficial by the DFO.

**Response:** We are not aware that we are requiring any grazing management that does not provide some benefits. We sometimes find that current management is not making progress toward all of the rangeland health standards. Changes in management would be required in this instance under all alternatives as specified in the Draft RMP/EIS.

The goal outlined in the Draft RMP/EIS is for riparian areas to meet the standard for rangeland health which is for these areas to be in properly functioning condition. We do not feel that any one practice will accomplish this goal on every riparian area. The grazing practices that would be applied would be designed to meet the goal of PFC and to meet the desired future condition. Specific grazing practices will be determined during the watershed analysis process.

**N24** **Comment:** We believe further clarification should be provided on application of the Standards and Guidelines to other uses.

**Response:** Page 33 of Chapter 2 of the Draft RMP/EIS identifies the application of Rangeland Health Standards during the watershed assessments. We evaluate the health of the rangeland against the standards and determine if adjustments need to be made to any resource use if the standard is not being met. Only guidelines for livestock grazing were developed by the RAC at the same time as the standards, but many best management practices, standard stipulations, and mitigation measures are available to guide management of other resource uses. All resource uses must comply with the standards.

**N25** **Comment:** BLM has no plan on determining range condition, trend and utilization on public lands.

**Response:** The Draft RMP/EIS identifies the application of Rangeland Health Standards during the watershed assessments. These assessments use any data collected or available that provide information on rangeland condition, trends and other information that will help in the assessment. A monitoring plan is developed for each area following the watershed assessments. These monitoring plans

are designed to measure progress toward the site specific objectives developed as part of the process.

**N26** **Comment:** Your document clearly indicates you don’t have a plan and will not utilize rest-rotation grazing as the primary method that should be used.

**Response:** The specific method of grazing on an allotment will be determined at the watershed analysis level. Rest rotation is certainly one of the methodologies that is employed in grazing management, however will not be the only method applied.

**N27** **Comment:** Maintaining and improving wildlife habitat and restoring degraded range conditions should be reflected in the purpose and need for the RMP.

**Response:** The *Purpose and Need* and planning issues are outlined on page xi and 1 of the Draft RMP/EIS.

**N28** **Comment:** BLM is not assessing impacts, and specifically economic impacts, based on a monitoring data base. In fact, the draft RMP/EIS does not address the impact to the County created by the reduction of livestock grazing as set forth in Table 31, page 210 (actual use compared to permitted use) and additional 11% decrease of grazing use levels as proposed in Alternative B, and the potential for another 40% reduction of grazing use levels created by cuts to AMP’s following watershed assessments. This must be disclosed as a foreseeable impact under NEPA.

**Response:** Table 31 on page 210 shows the difference between permitted and actual use AUMs. This is not a change in management being proposed in the RMP, thus no impacts are described. The differences are due to fluctuations in annual operations, operator convenience, rest pastures for livestock grazing systems and weather conditions such as drought. Impacts from implementation of the alternatives are described in Chapter 4 by alternative, then resource or program. BLM has indicated that there could be up to an 11 percent reduction in some instances. We are uncertain as to the reference to a 40% reduction of grazing levels, but the impacts described in Chapter 4 are doing exactly what is requested—disclosing foreseeable impacts under NEPA based on the best available information at the land use plan level.

Following watershed assessments, if standards are not being met and livestock use is a contributing factor, livestock management will be modified in order to make progress toward achieving standards. This could result in reduced grazing use if necessary.

**N29** **Comment:** We remained concerned about the inconsistency in the information provided regarding the resource use of wildlife, in that it does not allow for benchmark analysis to be used to describe maximum and minimums amount of resource production

**Response:** See response to Comment AA25.

**N30** **Comment:** It is not completely the cattle grazing that promotes sage grouse populations, but also the fact that ranchers who owned the cattle in the past shot predators who feasted on the grouse, their young and their eggs.

**Response:** The BLM does not have management responsibility for predator control and therefore has not addressed this issue.

**N31** **Comment:** I strongly support Alternative A in most applications. It has the most flexibility of all the alternatives. Alternative B could decrease livestock levels by 11%! If livestock levels are cut on BLM administered ground one could reasonably expect a corresponding increase on private ground. Are we transferring public ground problems to private lands? Does this solve the problem or are we just giving it to someone else? The -TT has already voluntarily increased on-ground monitoring, increased riding and reduced days of use on our BLM allotments to correct problems that were created before we were here. We have included State, Federal and private parties to find workable solutions. By looking only at one part of this problem we are not finding solutions by creating new problems. I feel the example of the Bar Double T ranch shows that by working on site-specific basis and inclusion of private, Federal and State inputs, the land will heal and the wildlife and fisheries will flourish. Under Alternative A we can continue collaborations that will have meaningful achievements.

**Response:** The collaboration described in the comment will continue under Alternative B as well. The reductions disclosed as a result of Alternative B management range from 0 to 11 percent based on best estimates and using analysis assumptions. Strategies besides reductions in AUMs are all explored during the watershed assessment and allotment planning processes.

**N32** **Comment:** BLM has a legal responsibility to carry out the law including State fence laws. Your Fence Manual H 1741-1 mentions the UIA of 1885, responsibility for BLM to follow as well as the Range Improvement Act. The BLM should be addressing illegal high fence such as the Roe bison fence. BLM does not even mention an inventory of fences on public lands is needed and wildlife-fence conflicts

be identified, fences should then removed and modified to allow the free movement of big game animals on public land and the UIA of 1885 and manual followed.

**Response:** BLM Manual H 1741-1 is referenced in the *Wildlife* sections of Chapter 2 on pages 21 and 76 of the Draft RMP/EIS. Fences on public land that are identified as barriers to wildlife movement will be modified to accommodate wildlife passage and new fence construction would follow specifications in the BLM manual under all alternatives including the flexibility to use other fence designs if the need exists and the analysis of the potential impacts shows that they can be avoided or mitigated.

**N33** **Comment:** Allowable Use: In the case of the Dillon RMP and DEIS, the BLM has recognized many times that the quality of the land in the project area is severely diminished. Thus, when the RMP seeks to improve "range condition," as it must, what this really means is that the RMP must provide for improved riparian, upland, and wildlife habitat conditions and include goals and objectives and allowable use standards to achieve those goals. The DEIS states that the goal of the livestock grazing program is to manage the public rangelands to provide for a sustainable level of livestock grazing consistent with multiple use and sustained yield, yet it fails to define what constitutes a sustainable level of livestock grazing.

**Response:** The Standards for Rangeland Health provide the baseline land health standards in the RMP/EIS. Changes in management will be made if needed to maintain or achieve these standards. Levels of any use must meet these standards. Levels of any use that do not maintain land health are not sustainable.

**N34** **Comment:** I agree that option B appears to have the best mix of management actions. However, if you would do a better job of taking care of the vegetation on the land you would not have the many problems you have today, including several endangered species. As I look from my living room at BLM pastures in the Ruby Mountains I see the same season-long excessive grazing pattern each year. Rest and rotation works in grasslands but you are not doing that on a lot of your land.

**Response:** The Western Montana Guidelines for Livestock Grazing and Montana's Best Management Practices for Grazing provide a number of management tools and systems that can be considered when BLM-administered lands are found not to be meeting land health standards as a result of watershed assessments.

**N35 Comment:** We have questions regarding the completeness and accuracy of the grazing disclosures made in the DRMP/EIS. The DRMP/EIS Chapter 4 discloses that Alternative A (current management direction) makes available 844,000 acres for grazing (113,000 AUMs/425 allotments). DRMP discloses that for Alternative D “the same amount of acres would be available for grazing as described in Alternative B and impacts would be similar to Alternative B. The DRMP/EIS Chapter 4 Alternative B vaguely discloses only that future rangeland health assessments (prepared sometime out in the future—if funds/personnel permit) “could cause changes, probably reductions, to the forage allocated to livestock.” “AUMs could be reduced by up to 11 percent from the current allocation of 113,000 AUMs.” Due to the above qualifiers, and the DFO’s past non-actions regarding grazing’s significant adverse impacts on nearly all other in-place resources, it is likely little will be done to bring the grazing allotments/AUMs into ecologically sustainable levels. Your DRMP/EIS appears designed to confuse the actual grazing/AUMs issue rather than to “fully disclose.”

**Response:** Land use plans do not provide specific solutions to specific problems. However, under NEPA we are required to disclose reasonably foreseeable impacts. We have disclosed the impacts discussed in Chapter 4 to the best of our ability in the clearest fashion possible using our best projections based on available data. The schedule for the watershed assessments has been projected and is displayed on Map 82. See the response to Comment N28 for additional information.

**N36 Comment:** It is proposed to remove domestic livestock as the solution to each and every ecological problem. What is needed in an RMP is an honest, complete, and realistic assessment of each rangeland ecosystem, within that ecosystems carrying capability. The same guidelines and standards that are imposed on domestic livestock must also be imposed on the wildlife in that rangeland ecosystem, or there will never be an improvement of the condition of the public land. The BLM as the agency responsible for the condition of the public land must determine each rangeland ecosystem’s carrying capacity. It is then the Montana Fish Wildlife and Parks, the state agency responsible for the public’s wildlife, duty to manage the wildlife accordingly.

**Response:** The Standards for Rangeland Health do apply to all uses and all uses are evaluated during the watershed analysis process. The BLM is responsible for the management of the livestock grazing on public lands so changes anticipated in

this use are addressed in the Draft RMP/EIS. The BLM is not responsible for managing the populations of wildlife that also use these lands so we do not address this in the Draft RMP/EIS. We do recognize that wildlife use can affect land health and will continue to work closely with FWP as they update their management plans for big game and other wildlife to attempt to address any identified concerns.

**N37 Comment:** As noted over a year ago, the last sentence of the paragraph on page 161 under *Fish Habitat Location and Condition* paragraph states, “On many streams, bank trampling and width-to-depth ratios are often excessive from long-term livestock use.” What appears to be the root cause of stream condition problems is not livestock grazing, but livestock grazing management. In the BLM Dillon Field Office, livestock grazing authority and management responsibilities lies not with the permittees, but are the responsibility of the professional land managers that develop Allotment Management Plans. If livestock-grazing management is contributing to the decline in condition of streams in the DFO, we would suggest the Resource Management Plan implement innovative and/or superior grazing management practices. The Draft EIS fails to adequately disclose why the DFO continues to require grazing management that is not perceived as beneficial by the DFO.

**Response:** See response to Comment I24. We would note that permittees are responsible for implementing the management prescribed in allotment plans.

**N38 Comment:** I feel the BLM should become proactive in the managing of grazing allotments, not only in the allocations of the allotments but also in the monitoring of allotments. It bothers me when I see in the paper ranches that are recognized for having good land stewardship programs but when visiting their federal allotments you are pressed to find a blade of grass, but their private land has grass 3 feet tall on it. This is especially disturbing when the federal land is listed on the travel plan map as a winter range. I realize the drought conditions during the past several years have not helped the situation. But it is during these time that special efforts should be made to make sure the lessees are in compliance with allotment numbers and that the ground situation is monitored frequently and AUM allocations be cut back if necessary.

**Response:** BLM conducts compliance checks, monitoring and has established a watershed evaluation schedule to assess if the *Western Montana Standards for Rangeland Health* are being met.



**N39** **Comment:** The latitude to retire grazing allotments is a tool that must be introduced at the plan level. This tool should be available to lessees that have chronic problems with particular allotments.

**Response:** Page 45 of the Draft RMP/EIS describes the process by which allotments could be designated as a resource reserve allotment or classified as unavailable for livestock grazing.

**N40** **Comment:** In 2003, GYC hired a private contractor to investigate the impacts of livestock grazing on the Idaho side of the Centennial mountain range. That report indicates that livestock trespass from the Montana side to the Idaho side is common and is resulting in serious resource degradation. The Dillon Field Office (DFO) should take strict measures to correct this abuse. GYC has asked the Dubois District Ranger for the Caribou-Targhee National Forest to collect unauthorized use fees, remove cattle and sheep from government property when trespass of this nature occurs, and initiate civil trespass action when such trespass occurs. We urge the DFO to do the same.

**Response:** BLM takes action to correct unauthorized use of BLM-administered lands within the planning area. Page 213 of the Draft RMP/EIS explains in general how unauthorized livestock grazing is handled.

**N41** **Comment:** As a suggestion for the Final RMP/EIS, when discussing a particular resource of use, please include all management prescriptions for that resource or use, even if the management prescription is included elsewhere. For example, the 7" herbaceous cover requirement is found in the wildlife section and not the livestock section of the Draft. This is extremely misleading and deceiving for people who are interested in livestock management but not wildlife.

**Response:** We have added language to the livestock grazing section, but have also clarified how the 7" herbaceous cover provision would be considered. It is not intended to be a "requirement" in all situations.

## MINERALS (other than OIL AND GAS)

**O1** **Comment:** In the final plan, the BLM should make thoughtful and considered withdrawals of areas from mineral leasing and location, instead of opening 99.57% of the DFO to potential locatable and leasable mineral development, as would be the case under the preferred Alternative B. Withdrawn areas should include all WSAs, all BLM-proposed ACECs, the Sagebrush Creek ACEC nomination, all of the Big Sheep Creek ACEC nomination, the combined Melrose-Maiden Rock and Tendoy Big-

horn Sheep ACEC nomination, and the Blacktail Wildlife Linkage nomination. High-density habitat for sensitive species such as Sage Grouse and pygmy rabbits should also be withdrawn. It is also recommended that BLM withdraw 99%-100% pure westslope cutthroat trout streams, and fluvial and adfluvial grayling waters from locatable mineral entry. It is also recommended that Wildlife Management Areas and established big game winter ranges be added to the withdrawal list for mineral entry. These areas were specifically purchased to protect wildlife and key habitats and should be protected from mining disturbances. Some BLM inholdings on Wildlife Management Areas like Robb/Ledford could experience mining activity that could affect the entire game range.

**Response:** We do not agree that the only way to protect the above identified values is to withdraw the area from locatable mineral entry or make it unavailable for lease. BLM is a multiple use agency and by policy must manage the land to accommodate numerous uses including mineral exploration and development. At the same time it must work under the existing laws, regulations and management practices to protect the environment. These requirements are all taken into account when a proposal to develop a mining project is received and the environmental impacts are analyzed in detail in the subsequent NEPA process.

Alternative B (the Preferred Alternative) includes those areas the BLM believes cannot be adequately protected by existing laws, regulations and management practices. An application/proposal for withdrawal is prepared once the RMP is approved identifying the recommendations for withdrawal. This application/proposal must convince the Secretary of Interior, the BLM Director and watchful members of the public as to "...why existing laws, regulations, and management practices will not adequately protect the resources or capitol improvement?" It must also present extensive documentation to meet other requirements and show compelling evidence in order to gain the Secretary's approval of the withdrawal.

## O2

**Comment:** The section on page 111 is somewhat confusing, since it refers to Appendix I where it appears off-road travel could be allowed on a case-by-case basis in regard to locatable minerals, but the section discusses geophysical exploration. While we understand that the surface owner has the sole right to dictate travel restrictions, some Wildlife Management Areas (such as Robb-Ledford) have BLM inholdings that are managed in conjunction with the State game range. Others, such as Wall Creek, have adjacent BLM lands that are closely linked and associated with wildlife use

on the Wildlife Management Area. Therefore, we recommend no travel off open roads on Wildlife Management Areas or associated BLM lands for exploration or development of minerals.

**Response:** Cross-country travel by motorized wheeled vehicle is currently not allowed off of existing roads and trails. The RMP will further refine this by limiting travel to designated routes. Generally, access is provided to mining operations under a Notice or Plan of Operation for locatable minerals, or as part of the permit for leasable and salable operations. When access is necessary across non-BLM ownerships, the operator must negotiate with the landowner, and thus Fish, Wildlife, and Parks would have opportunity to manage for their concerns. **Appendix I** does allow for exceptions to be considered for travel in restricted areas on BLM lands when necessary. The appendix states that “activities might include, but would not necessarily be limited to...” and then proceeds to give examples. Therefore, exceptions could apply to geophysical exploration, or other uses that are not listed. Values in the area, including the location of areas within or adjacent to a Wildlife Management Area, would be considered if any exceptions were proposed. You may want to note that the BLM inholdings in the Robb-Ledford area and adjacent to Wall Creek are not located within high or moderate potential locatable mineral areas (see Map 84).

**O3 Comment:** While mining districts within the Dillon Field Office area are identified on Table 35, page 217, it would also be helpful to identify where active and inactive (abandoned) mines are located on a map, and to identify mine sites where reclamation work is needed for environmental restoration, and the proposed implementation schedule for mine reclamation.

**Response:** Numerous abandoned mine features currently exist on public land. Identifying and categorizing these features is a continuous process and BLM will continue to prioritize and abate the hazards as resources are available, with emphasis on any areas that are determined to threaten water quality. This issue is addressed in Chapter 2, page 71, in the *Abandoned Mine Lands* section as “Management Common to All Alternatives”.

In 1995 the Montana Department of State Lands published a document titled “Abandoned Hardrock Mine Priority Sites, 1995, Summary Report”. BLM uses this document for identifying, prioritizing and obtaining valuable information on abandoned mine sites. Due to the number and complexity of abandoned mine features and the changing status of “active” mines, it would be difficult to place all the known features and their attributes

on a map at a scale that would be useful in the RMP. The *Locatable Minerals* section in Chapter 3 of the Draft RMP/EIS provides an overview of existing mines in the planning area.

**O4 Comment:** There is a need to protect the taxpayer from the potential expense of reclamation and remediation following hardrock mine financial failures or abandonment.

**Response:** BLM by regulation must collect a reclamation bond for proposed mining operations based on the estimated cost of a third party contractor to reclaim the disturbance. BLM cannot collect a bond on unknown or possible occurrences or events.

**O5 Comment:** EPA supports the mineral withdrawals proposed in Alternative C. While mining that can provide valuable raw materials, mining in some locations has impacted public health and the environment (i.e., from acid mine drainage and metal and nitrogen contamination of surface and ground waters), we believe there are environmentally sensitive areas that should not be available to mining.

**Response:** See response to Comment O1.

**O6 Comment:** The RMP and EIS should evaluate and consider the potential for acid mine drainage and/or metal or nutrient transport or pollution to occur during mineral exploration and development on BLM lands. Impacts to water quality from active and inactive mining on BLM lands within the Dillon Field Office area should be identified and disclosed.

**Response:** Acid mine drainage and/or metal or nutrient transport or pollution is addressed in detail in the NEPA document prepared for proposed mining projects at the activity level. Since mining is site-specific it would be impossible within the RMP to evaluate the pollution potential and concerns of future proposed mines. In terms of abandoned mine sites, please see the response to Comment 3.

**O7 Comment:** In regard to placer mining we draw your attention to the publication, Montana Placer Mining BMPs, Montana Bureau of Mines & Geology Special Publication 106, available from Mr. Robin McCulloch, MBMG, Main Hall, Montana College of Mineral Science and Technology, Butte, Montana 59701. This publication describes mine planning, design, operation and reclamation practices to mitigate environmental impacts and water quality degradation from placer mining.

**Response:** We have added an appendix on Best Management Practices to the document and have included this reference.

**O8** **Comment:** FWP supports the withdrawal of Axolotl Lakes and Road Agent Rock from mineral entry.

**Response:** Under Alternative B, Road Agent Rock is still proposed for withdrawal from locatable mineral entry to protect resource values. The proposed withdrawal of the 400 acres BLM obtained in the Axolotl Lakes acquisition, in progress at the time the Draft RMP/EIS went to print, has been approved and is now withdrawn from locatable mineral entry.

**O9** **Comment:** Page 110, Alternative B. BLM land immediately around Bannack has been withdrawn from mining under a Recreation and Public Purposes Patent. It appears this area would be closed to oil and gas leasing in Alternative B (National Historic Landmarks). FWP supports this closure.

**Response:** As presented under Alternative B in Chapter 2, lands within the boundaries of designated National Historic Landmarks will not be leased for oil and gas.

**O10** **Comment:** We would like to see the Centennials withdrawn from any mineral entry.

**Response:** The values in most of the Centennial Mountain range are adequately protected from mineral entry and development by provisions in the BLM's *Interim Management Policy for Lands Under Wilderness Review* and through regulatory procedures. See the response to Comment O1 for further discussion. Because of this, the withdrawal proposal from Alternative A was not carried forward into the action alternatives in the Draft RMP/EIS, and will not be proposed in the Proposed RMP/Final EIS.

## OIL AND GAS

**P1** **Comment:** The RFD scenario predicts that six wildcat well could be drilled in the area in the next 10 to 15 years, of which only two would likely involve gas discoveries, which may engender four additional step out production wells in the Big Hole and Lima areas (Appendix H, page 96). While it appears that the potential for oil and gas development in the Dillon Field Office area is limited, we recommend that areas with fragile or environmentally sensitive resources be stipulated as No Lease (NL) or at least as "No Surface Occupancy" (NSO). We are pleased that wetlands, floodplains and riparian areas and areas of active mass movement and steep slopes and National Historic Register and traditional cultural properties are stipulated NSO (Table 6, page 49), and that wilderness areas and wilderness study areas would not be leased. We are also pleased that the NSO buffer for Class 1 fisheries and pure westslope cutthroat streams is

proposed to be increased to 1/2 mile from 1,000 feet.

**Response:** We assume that this comment addresses Alternative B. The BLM is required by our planning handbook, H-1601-1, at **Appendix C**, page 10 to use the least restrictive stipulations to meet resource protection objectives. The suggestion was made that areas with fragile or environmentally sensitive resources be closed to leasing or at least leased with a No Surface Occupancy stipulation. However, no specific definition of areas with fragile or environmentally sensitive resources is given. Table 6, pages 48 and 49 of Volume 1 of the Draft RMP/EIS is only a summary of the stipulations considered in the RMP. For the detailed language for all the stipulations, including possible waivers, exceptions, or modifications please refer to **Appendix H**. The detailed listing of stipulations considered under all four alternatives analyzed in the draft begins on page 117 of Volume II. Stipulations for Alternative B are found on page 127 through 139. We believe that after the analysis completed for the Draft RMP/EIS the stipulations chosen for Alternative B properly meet the goals, objectives, and desired future conditions developed in the RMP.

## P2

**Comment:** Do not allow oil and gas exploration and development in the Blacktail Linkage ACEC nomination. Rationale: The associated activities would compromise the unique qualities of the ACEC. All BLM lands within the Blacktail ACEC should be withdrawn from mineral leasing and development.

**Response:** The Blacktail Wildlife Linkage ACEC nomination was not carried forward as a potential ACEC. It did not meet the relevance criteria for natural systems or processes within public lands given the scattered public land ownership or for fish and wildlife resources given similar habitats in the area and region. The BLM is required by manual and handbook to use the least restrictive stipulations or other mitigation measures to meet resource protection objectives. We are directed not to make discretionary no leasing decisions except in cases where there is no way that impacts from oil and gas development can be mitigated. Based on our analysis we feel that impacts from oil and gas leasing and development can be mitigated by stipulations identified in the Draft RMP/EIS to protect resource values.

## P3

**Comment:** NSO stipulations should be extended to all portions of the WSA in the Ruby Mountains and not just the recommended wilderness portion.

**Response:** The NSO stipulation would only come into play if the area is released from WSA status

by Congress. Until then, none of the area is subject to leasing by regulation. If the Ruby Mountains WSA is released from its status as a WSA the southern portion is slated, under Alternatives B and C, to be managed for an emphasis on other resource values such as commercial timber harvest or livestock grazing while still seeking to maintain the overall natural appearance of the landscape. Management would be similar under Alternative D. A blanket no surface occupancy (NSO) stipulation can only be applied in an area where analysis indicates that other constraints such as timing limitation (TL) or controlled surface use (CSU) stipulations would not adequately protect resources in the area. Our analysis would indicate that constraints other than a blanket NSO stipulation would adequately mitigate impacts from oil and gas development.

**P4 Comment:** Axolotl Lakes WSA has many unique resources found nowhere else in the region. The wilderness values of the WSA were used to justify the recent Axolotl Lakes Land Exchange, and rightfully so. It is therefore critical that the BLM commit to maintaining and protecting these same wilderness characteristics in the revised RMP.

While we appreciate the NSO stipulations for oil and gas development, the reality is that even with NSO, significant impacts to the land can occur if minerals are discovered. Instead of taking that risk, the BLM should withdraw the Axolotl Lakes WSA from oil and gas leasing availability.

**Response:** As long as the Axolotl Lakes WSA retains that designation, the BLM is precluded by regulation from leasing any portion of the WSA. If the designation is revoked the BLM is required by manual and handbook to use the least restrictive stipulations to meet resource protection objectives. We are directed not to make a discretionary no leasing decision except in the case where there is no way that impacts from oil and gas development can not be mitigated. Based on our analysis we feel that impacts from oil and gas leasing and development in the WSA could be mitigated by stipulations identified in the Draft RMP/EIS to protect resource values.

**P5 Comment:** Overall, the BLM has stated that there is very little mineral development potential in the DFO as part of the RFD process. However, the preferred alternative only protects 16% of the resource area from oil and gas development. Given what we have learned about the effects of oil and gas development on wildlife species such as elk, sage grouse and bighorn sheep, this does not seem like a balanced approach, especially in relation to the low development potential here.

Alternative C best protects the resource area's wildlife, fisheries and recreation resources, as outlined in table 6, page 48 of the DEIS. Also, because we did not see a map that specified which areas would be identified for 'no lease' stipulations, so we want to assure that alternative C also includes the Centennial, Gravelly and Snowcrest ranges as closed to leasing to protect key wildlife habitat.

As has been stated in our comments on WSAs, we also request that the BLM withdraw these important areas from leasing potential in all action alternatives.

The combination of the low development potential and the high wildlife values on the DFO make the provisions identified in Alternative C the most logical choice. Alternative C makes 20%, over 268,000 acres, of the lands under purview of the resource area available for mineral development. Given the disproportionate impact mineral development has on other resources and other resource users, that is 20% being set aside solely for mineral development, which is significant.

The question of mineral development is especially important in the broader context of other BLM lands across the west. Mineral development on other resource areas in Montana and Wyoming is booming, and it is critical that some significant portion of public BLM land is secure from the industrialization that is occurring elsewhere.

While significant development had not occurred on the DFO, certainly it could happen in the foreseeable future given the pattern of development elsewhere. Because of the greatly increased mineral development on other BLM lands in the west, if developable minerals exist on the DFO, it is highly likely that development would occur during this planning cycle. Therefore, this planning process will be the BLM's only opportunity to protect these important lands and wildlife populations that are being sacrificed elsewhere.

**Response:** When it is noted that only a small percentage of the planning area is completely protected from oil and gas development, the comment neglects to recognize the fact that the portion of the planning area open to leasing under the preferred alternative would be leased with a variety of environmental safeguards. Twenty one percent of the planning area would be leased under standard lease terms which include numerous environmental safeguards. The remaining portion would be leased under standard lease terms with the addition of a package of special stipulations added to protect identified values and resources in that particular lease.

The BLM is required by manual and handbook to use the least restrictive stipulations to meet resource protection objectives. We are directed not



to make discretionary no leasing decisions except in the case where there is no way that impacts from oil and gas development can not be mitigated. Based on our analysis we feel that impacts from oil and gas leasing and developments in the areas that you have requested that we close to leasing can be mitigated by stipulations identified in the Draft RMP/EIS to protect resource values.

In response to the comment that if developable minerals exist within the boundaries of the Dillon Field Office it is highly likely that development would occur during this planning cycle, we would refer the author to Volume II, **Appendix H**, pages 95 through 97 which detail the drilling activity forecast for the Dillon Field Office. This forecast contains the BLM's best analysis of how many wells that might be drilled in the Field Office in the next 10 to 15 years. As noted we believe that six wildcat wells will be drilled with four being dry holes. For analysis purposes we have hypothesized that two of the wells would be producing wells with one well located either on Forest Service lands or on minerals administered by the BLM. Each of these wells would probably prompt additional step-out wells. For analysis purposes we estimate that a total of four step-out wells would be drilled. Not all of these would be producing wells. It also must be explained that these 10 wells would not be drilled solely on BLM administered mineral but may be drilled on fee lands, state lands, or lands administered by the Forest Service.

**P6 Comment:** The DRMP fails to adequately consider the impact of oil and gas development on vulnerable sage grouse populations. The DRMP opens areas the BLM has identified as prime sage grouse habitat to damaging oil and gas leasing. The draft RMP would do nothing to stem the habitat loss that has reduced grouse number by 90 percent over the past century and, in fact, could hasten it. Though the draft RMP includes "stipulations" for oil and gas drilling activities that are aimed at protecting Sage Grouse, standard BLM practice in recent years has been to waive these protections when asked to do so by oil and gas companies. For example, the Pinedale Field Office in Wyoming granted 112 industry requests for exceptions to Sage Grouse stipulations from 2003-2004, and denied only 8 requests. (See [http://www.wy.blm.gov/pfo/wildlife/wild\\_Sage\\_exc0204.htm](http://www.wy.blm.gov/pfo/wildlife/wild_Sage_exc0204.htm).)

The draft RMP for Dillon implies that all sorts of subjective exceptions from protective stipulations for Sage Grouse are possible. For example, exceptions can be granted when a well operator submits a plan "that demonstrates that impacts from the proposed action are minimal or can be ad-

equately mitigated," when an "authorizing officer" decides that portions of the area are no longer Sage Grouse habitat, or when new information indicates that the timing restriction is invalid for a particular leasehold (**Appendix H**, page 127). The draft RMP anticipates similar exceptions to other stipulations, such as those designed to protect big game animals, elk birthing areas, bighorn sheep habitat, bald eagle nesting sites, wetlands, peregrine falcon nesting sites, raptor breeding territories, ferruginous hawk breeding territories, Class 1 fisheries, westslope cutthroat trout, paleontological and cultural resources, and so on (**Appendix H**, pages 117-156).

In practice, this level of "flexibility" results in serious negative impacts to sage grouse and other values stipulations are designed to protect. It is clear that stipulations are subject to exceptions and waivers, that the BLM has demonstrated a history of compliance with industry demands to provide exceptions to stipulations elsewhere, and that it anticipates numerous exceptions to stipulations within the Dillon Area. It is therefore abundantly clear that the only way to assure protection of wildlife and habitat values in general and ACECs in particular, is to place such areas off-limits to leasing and development entirely.

**Response:** The commenters are correct in stating that the RMP allows for waivers, exceptions and modifications to stipulations. All but six of the stipulations analyzed for the preferred alternative do contain language that allows for waivers, exception, or modifications to the stipulations. Similar flexibility is built into the other alternatives. However, we do consider that the stipulations in the Draft RMP/EIS are firm "standards" that give the authorized officer the appropriate flexibility to respond to changing conditions in the Field Office.

Sage grouse habitat mitigation measures found in the preferred alternative are based on professional analysis and as required by BLM policy are the least restrictive measures that will mitigate impacts to grouse and protect grouse habitat. Waivers, exceptions, or modifications will only be granted when the criteria in the RMP, regulations at 43 CFR 3101.1-4, and the requirements of BLM Handbook H-1601-1 at **Appendix C** can be met.

In Montana and the Dakotas, BLM rarely receives requests for waivers, exceptions, or modifications (15 requests in the last three years with six denied). It is unrealistic to compare the situation in the Pinedale FO to what might occur in the Dillon FO based on the level of development activity occurring in the Pinedale FO and the level forecast for Dillon. The commenter should also note that some of the stipulations do not contain provisions

to be waived, excepted, or modified (see **Appendix H**).

**P7 Comment:** Some lands surrounding the Hidden Pasture WSA are proposed to be leased with a No Surface Occupancy (NSO) stipulation. This surface management technique is redundant if the WSA is maintained and those lands are not available for lease. Lands surrounding the Hidden Pasture WSA should be offered for lease with only seasonal restrictions. Keeping the NSO stipulation on these lands only exacerbates the liberties you have taken in managing an area as wilderness which lacks Congressional authorization.

**Response:** Under the preferred alternative BLM lands surrounding the Hidden Pasture WSA would be leased with a variety of stipulations, not just NSO stipulations. These stipulations were identified as needed by resource specialists during an interdisciplinary analysis. They would be applied to mitigate impacts to resource values existing in the area. They do not relate to the WSA.

**P8 Comment:** We did not see a map that specified which areas would be identified for no lease stipulations.

**Response:** Maps 27 through 30 identify areas that would not be available for lease, lands subject to stipulations, and lands subject to Standard Lease Terms. No lease areas are shown in the dark blue and include some but not all lands in the Centennial, Gravelly and Snowcrest ranges. In areas that are available for leasing, key wildlife habitats are protected by stipulations described in **Appendix H**.

**P9 Comment:** Include the Centennial, Gravelly, and Snowcrest Ranges as closed to leasing to protect key wildlife habitat.

**Response:** The BLM is required by manual and handbook to use the least restrictive stipulations to meet resource protection objectives. We are directed not to make a discretionary no leasing decision except in the case where there is no way that impacts from oil and gas development can be mitigated. Based on our analysis of all alternatives we feel that impacts from oil and gas leasing and development in these areas could be mitigated by stipulations identified in the Draft RMP/EIS to protect other resource values.

**P10 Comment:** Use of directional drilling should include the caveat that it is encouraged in development, not exploration. Rarely do governmental agencies or others realize the additional costs involved in directional drilling can increase costs 25-50%. While this method of drilling has its merits,

it can also render a prospect uneconomic. This method should only be used in a small number of cases and should not become an expected operation of companies wishing to develop their leases.

**Response:** The BLM does not dictate to a lessee how they must develop their lease. It would be up to a lessee to determine the most appropriate technology to use when drilling either exploratory wells or development wells.

**P11 Comment:** There is currently no oil and gas drilling or development in the Dillon Resource Area. This would change under all of the alternatives proposed in the draft RMP. The preferred Alternative B proposes opening 89% of the resource area to oil and gas leasing – only 2% less than the most extractive and invasive alternative, Alternative D. In fact, the only areas the draft plan does not open to oil and gas development are those that the BLM is legally incapable of opening – the Bear Trap Wilderness Area and the ten Wilderness Study Areas. Though the BLM has the authority and ability to restrict availability for leasing, the draft plan fails to provide any balance or to temper this “open it all up” policy.

**Response:** The BLM is directed by manual and handbook to use the least restrictive stipulations to meet resource protection objectives. We are directed not to make discretionary no leasing decisions except in the case where there is no way that impacts from oil and gas development can be mitigated. Based on our analysis we feel that impacts from oil and gas leasing and developments in the areas that you have requested that we close to leasing can be mitigated by stipulations identified in the Draft RMP/EIS to protect resource values.

**P12 Comment:** The BLM has the responsibility to implement a multiple use standard on public land, and to protect its multiple values. The draft RMP recognizes that the Dillon Resource Area contains a wealth of valuable wild resources, from spectacular scenery to endangered species, from sensitive trout and Sage Grouse populations to fragile sand dune ecology. Extractive uses that fragment habitat and disturb land and wildlife are not compatible with protecting wild values. Yet the DRMP opens even proposed ACECs, with recognized relevant and important values, to mineral location and oil and gas leasing. The DRMP/EIS fails to adequately address or explain the impacts of this decision.

**Response:** The BLM does manage the public lands for multiple uses as defined in the Federal Land Policy and Management Act (FLMPA). This Act specifically directs the BLM to take into account the long term needs of future generations for both

renewable and nonrenewable resources. It specifically lists mineral resources as an acceptable resource use. We believe that the provisions in the Draft RMP/EIS will protect the planning area from permanent impairment of the productivity of the land and protect the environment. The draft RMP has considered an appropriate array of alternatives. We are mandated to consider resources uses in addition to resource protection.

**P13** **Comment:** Eighty-five percent of oil resources and eighty-eight percent of natural gas resources on federal lands in Montana, Wyoming, Utah, Colorado and New Mexico are already available for leasing and development. Given these facts, and given the need for balanced management to protect the DFO's valuable and vulnerable natural, cultural and scenic resources, it is clear that the DRMP opens an excessive amount of land to oil and gas leasing.

**Response:** The Energy Policy and Conservation Act (EPCA) inventory establishes that 36 percent of Federal lands inventoried in the five states mentioned are not available for leasing. Slightly more than 25 percent of the lands are available but would be leased with stipulations in addition to the standard lease terms. The remainder is available for lease with standard terms which allow for the enforcement of non-discretionary statutes such as the Endangered Species Act. We believe that, based on the reasonably foreseeable development scenario for oil and gas for this planning area (10 total wells on all ownerships for the life of the plan) and our analysis, we have developed a balanced set of alternatives in the draft that protect other resources while allowing for oil and gas leasing and development.

**P14** **Comment:** The reasonable foreseeable development scenario (RFD) projects a total of 10 new wells – 6 wildcat wells and 4 production wells. Construction and development of these wells would involve 2-million-pound drilling rigs moved in 40-50 truck loads, repeated trips by a water trucks, bulldozers, scrapers, graders, service trucks, workman's vehicles, pipeline construction, road construction and many other invasive and disruptive activities and vehicles (**Appendix H**, pages 100-102). The potential for oil and gas production is admittedly low – the DRMP identifies only 190,722 acres of BLM managed land in the DFO with a "moderate" oil and gas development potential, and identifies no areas of high potential (DRMP, page 215). The value of other resources, however, such as permits to hunt bighorn sheep, recreation, and natural and cultural assets is high. Why has the BLM placed an irrationally high pre-

mium on invasive and speculative oil and gas development – to the detriment of all other DFO values?

The BLM should solve the oil and gas development problem in the final plan by making thoughtful and considered withdrawals of areas from mineral leasing and location, instead of opening 89% of the DFO to potential oil and gas development. Withdrawn areas should include all thirteen BLM-proposed ACECs as well as the Sagebrush Creek ACEC nomination, all of the Big Sheep Creek ACEC nomination, the combined Melrose-Maiden Rock and Tendoy Bighorn Sheep ACEC nomination, and the Blacktail Wildlife Linkage nomination. High density habitat for sensitive species such as sage grouse and pygmy rabbits should also be withdrawn.

**Response:** This comment requests that all BLM potential ACECs as well as four nominated ACECs not carried forward and high density sage grouse and pygmy rabbit habitat be put off limits to all oil and gas leasing. BLM believes the standard management requirements developed for each alternative, including required stipulations placed on oil and gas leases adequately protects the values in the areas addressed in the comment. Where this is not the case in Alternative B, potential ACECs have been proposed for designation. While designation by itself does not automatically prohibit or restrict other uses in the ACEC area (with the exception of that a mining plan of operations is required for any proposed mining activity within a designated ACEC), special management requirements beyond what would be standard management for proposed ACECs are listed on page 64-66 of the Draft RMP/EIS. The BLM believes that the special management requirements in addition to normal management (i.e., required stipulations, if any) would mitigate impacts caused by oil and gas activities within the BLM proposed ACECs. There is no need or rationale to support the withdrawal of all of these areas.

The BLM is required by manual and hand-book direction to use the least restrictive stipulations to meet resource protection objectives. We are directed not to make a discretionary no leasing decision except in the case where there is no way that impacts from oil and gas development can be mitigated. Based on our analysis of all alternatives we feel that impacts from oil and gas leasing and development in these areas could be mitigated by stipulations identified in the Draft RMP/EIS to protect resource values or the special management identified for proposed ACECs.

**P15** **Comment:** The Tobacco Root Tack-on WSA would be available for leasing under Alternatives

B-D, but is currently not available. Why would all action alternatives offer this WSA for leasing? In the wildlife section for Table 6, we would like to see a section for wildlife linkage habitat and NL or NSO stipulations applied to these areas.

**Response:** The rationale for management of the existing Tobacco Root Tack-on WSA under Alternatives B, C and D is found in the *Wilderness Study Area* section on page 68 and 69 of Volume I of the Draft RMP/EIS. The BLM is required by manual and handbook direction to use the least restrictive stipulations to meet resource protection objectives. We believe the stipulations applied to the resource values identified in Table 6 in the wildlife and other resource sections will adequately protect those areas that are available for lease. Many of the wildlife linkage habitats overlap with WSAs which are not available for lease.

**P16 Comment:** You should select Alternative A for geophysical activities. Geophysical activities are an integral part of the oil and gas exploration process and their management plans should complement those for oil and gas leasing. Geophysical activities require an area size reaching beyond the lease boundary to create an overlap or fold which will produce a useable product.

**Response:** We appreciate the suggestion. While Alternative A may be the least restrictive alternative for geophysical activities; Alternatives B through D also provide ample alternatives for geophysical exploration within the Field Office boundaries on BLM lands.

**P17 Comment:** Lands available for oil and gas leasing with stipulations that restrict exploration and/or development for more than six (6) months during a calendar year should be identified as “limited no surface occupancy” for purposes of this document.

**Response:** While we understand your comments and acknowledge that there may very well be areas where either because of one stipulation or a combination of two or more stipulations an operator may only be able to occupy a lease for less than six months, we have no plans to identify such lands as being subject to “limited no surface occupancy.” The terminology used in the Draft RMP/EIS is standardized across the BLM and was adopted in order to standardize stipulations to make it easier for members of the public to understand our land use plans and understand our leasing program.

**P18 Comment:** Several places in the document BLM describes the degree of geological potential as moderate or low, with no acres indicated as high. This feeling is primarily derived from expression made by companies wishing to explore in the Dillon Field Office area. How can you expect much

interest from companies if exploration has been delayed for over ten (10) years while this document has been planned and prepared? In the current climate of high oil and gas prices, there would be a high degree of interest by companies if BLM can complete its planning document in a legitimate time frame and offer leases with reasonable stipulations. This perspective should be part of the geologic discussion.

**Response:** We would refer the author of this comment to pages 214 and 215 of Volume 1 of the Draft RMP/EIS. As noted in the RMP, both the occurrence and development potential for oil and gas were systematically mapped in the Dillon Field Office using specific criteria that are not based on industry expressions of interest. However, when industry provided data it was reviewed and used in the classification as appropriate.

## OUTSIDE THE SCOPE

**Q1 Comment:** The Jefferson River Watershed Council decided in 2001 to attempt to address the water quality concerns in the upper Jefferson River watershed on private lands. The Jefferson River Watershed Council is working closely with MDEQ to develop Water Quality Restoration Plans for the water bodies listed on the State 303(d) list. The Jefferson River Watershed Council would like to work cooperatively with the BLM. The Jefferson River Watershed Council is working to address water quality concerns on private lands and would like to coordinate with the BLM as you address water quality issues on public lands. Therefore, the Jefferson River Watershed Council would like to request that funding and technical staff be allotted for this interest through 2007.

**Response:** This request for assistance is outside the scope of the RMP process, but has been passed onto appropriate channels.

**Q2 Comment:** The BLM did not mention the budgets. I am specifically interested in the wildlife and recreation budgets. BLM had proposed and tried to pool all activity budgets a few years ago so then the manager could use the money as he or she sees fit. Pooling appropriated funds is a violation of the Appropriations Act and BLM promise to Congress how the money will be used in the preliminary and annual work plan. Pooling money would misuse the wildlife and recreation budgets for projects actually detrimental to those resources. BLM needs an audit of budgets now and include this in a new Alternative D.

**Response:** Proposals to audit budgets are not land use plan decisions and will not be included in the Proposed RMP/Final EIS.



**Q3** **Comment:** Whether all this paper will result in better management on the ground is hard to say. Please tell us in the final EIS and plan what the cost is. I am certain the figure is very high. That information MUST be included in the final plan.  
**Response:** There is no requirement to include this information within a land use plan.

**Q4** **Comment:** We understand BLM is paying wages to personnel that are supposed to be “access coordinators.” Just what do they do anyway?!

**Response:** Staffing issues are administrative in nature and are not within the scope of a land use plan document.

**Q5** **Comment:** Should road closures take place then we should also see a reduction of BLM employees by 50% as we no longer need as many people to manage the locked ground.  
**Response:** See the response to Comment Q4.

**Q6** **Comment:** Many diseases carried by domestic livestock, in particular domestic sheep, are fatal to bighorn sheep. Livestock disease management protocols and livestock free zones on important bighorn sheep habitat have not been articulated in any alternative reviewed. The viability of imperiled native bighorn populations in the project area and throughout southwest Montana remains in question.

Brucellosis is an important disease affecting elk, wild bison and other wildlife in the Greater Yellowstone Region that use or could use BLM lands. Brucellosis is also an important disease to the livestock industry, of which some entities lease BLM lands for periodic grazing use. Perceived threats of brucellosis transfer to susceptible cattle limit wild bison movements, time and numbers to public lands in the Greater Yellowstone Region, including BLM lands in southwest Montana. Establishing a wild elk-bison habitat management area in the Greater Yellowstone Region of southwest Montana that may require limitations or stipulations on livestock use makes sense from a disease management as well as a wildlife ecology perspective. Failure to address livestock diseases that are fatal to wildlife such as bighorn sheep or diseases such as brucellosis that may limit the lands available to both livestock and certain wildlife is a major shortcoming of the RMP as written.

**Response:** The issue of livestock disease is considered outside the scope of the RMP for the reasons presented on page 8 of Chapter 1 of the Draft RMP/EIS.

**Q7** **Comment:** The RMP for the Dillon Field Office has failed to analyze issues of utmost importance

for the protection of habitat and the recovery, conservation and management of native species such as wild bison, bighorn sheep, native fish, sage grouse and sagebrush habitat types. For instance, BLM claims on page 8 and 9 of the RMP that livestock diseases, wildlife diseases, bison habitat, re-introduction of native species, wildlife numbers, management indicator species, suitability of livestock grazing and coordinated interagency management areas and/or areas of critical environmental concern for fish, wildlife and water are all issues beyond the scope of this planning process. These issues appear fundamental to proper planning if BLM intends on providing habitat for viable populations of native species and restoration and protection of watershed values. Thus, the RMP and the alternatives discussed do not serve the public interest. Quantity and quality of habitat, including water, affects all the issues listed above. As well, the quantity and quality of habitat is affected by many of the issues BLM has declared beyond the scope of this planning process. Habitat management is supposed to be one of BLM’s main objectives. However, fish and wildlife habitat and watershed management often transcends landownership boundaries, requiring an interdisciplinary/interagency approach to be successful (Murphy and Noon 1992). BLM is a key landowner and critical partner for fish, wildlife and watershed management in southwest Montana. BLM’s position that the issues listed on page 8 and 9 of the RMP are beyond the scope of this analysis is perplexing and leaves the interested public little more than opportunities to shuffle chairs on the Titanic. Failure to analyze the impact BLM management is having in conjunction with other landowners/managers in the area on these important issues, in an interagency coordinated

**Response:** Cumulative impacts are presented in Chapter 4 of the Draft RMP/EIS and were developed using the assumptions listed on page 266. Many of the issues raised in the comment are outside the scope of this land use plan and have been addressed as such in the Draft RMP/EIS.

**Q8** **Comment:** I hope the BLM will recommend permanent wilderness protection for all 10 WSAs.

**Response:** The *Wilderness Study Area* section of Chapter 3 of the Draft RMP/EIS describes the recommendations that currently sit before Congress. None of these recommendations, with the exception of the Tobacco Root Tack-on findings, can be changed.

**Q9** **Comment:** The Big (sic, Hidden) Pasture Wilderness Study Area (WSA) classification should be extinguished. Lands within this old WSA should

be leased for oil and gas development with limited surface disturbance stipulations.

**Response:** The Draft RMP/EIS explained the status of Wilderness Study Areas and the inability of BLM to “extinguish” these classifications. Changes to WSA designations and recommendations that have already been forwarded to Congress are outside the scope of the decisions that can be made in this RMP.

**Q10 Comment:** Please consider the resolutions adopted by Jefferson County regarding the Right-to-Mine Policy, Supporting Access to Forest Service, State and BLM Lands in Jefferson County, and Supporting Active Forest Management. We feel there is a need to preserve a way of life as well as jobs in Montana.

**Response:** None of the resolutions apply to lands within the planning area covered by the Draft RMP/EIS. However, Beaverhead and Madison Counties participated in developing the Draft RMP/EIS as Cooperating Agencies and similar concerns have been considered in the planning process.

**Q11 Comment:** BLM should also be familiar with Title 18-Chapter 47-Fraud and False Statements and Title 43-Public Lands 111, Restrictions on officers, clerks, and employees, Title 43 Public Lands Subchapter 1 v-Range Management. I have enclosed copies for “References Cited” and the final report.

**Response:** The information provided is administrative in nature and is not related to land use plan decisions presented in an RMP.

**Q12: Comment:** The route in the Dyce Creek area from the south ridge summit west down to Scudder Creek, and others in the area, need a sign or a gate to indicate that it is closed.

**Response:** Placement of signs is outside the scope of a land use plan decision, but this information has been passed onto the recreation staff in the Dillon Field Office.

**Q13 Comment:** There was a BLM vehicle left on BLM land after it was destroyed by a fire in the 1970’s and it has never been removed.

**Response:** BLM had agreed with a private party (at their request at the time of the fire) that if they removed the vehicle, they could salvage parts. Unfortunately after the party salvaged the parts, they left the remainder of the vehicle abandoned. We are coordinating equipment and staff to remove the remainder of this abandoned vehicle.

**Q14 Comment:** Establish the Big Sky Country National Park on all 900,000 acres of the planning area, and

designate the Big Sky Country Wilderness.

**Response:** Establishment of National Parks and Wilderness designations are not decisions made by BLM in land use plans.

**Q15 Comment:** What is being studied for wilderness in the West Pioneer?

**Response:** BLM manages little land in the West Pioneer area and is not studying any for wilderness. We believe the commenter should contact the Beaverhead-Deerlodge National Forest as our coordination with them shows they are conducting wilderness reviews in that area for their plan revision.

**Q16 Comment:** We support the BLM’s efforts in obtaining access to public land in the Lost Creek area on the east side of the Pioneer Mountains. We encourage you to continue this effort.

**Response:** The Lost Creek project is a site-specific analysis and decision process and is not specifically addressed in the RMP since it is not a land use level plan decision.

## PROCESS, PUBLIC INVOLVEMENT, and EDITORIAL

**R1 Comment:** The Draft RMP/EIS is too often “single issue” driven. The central theme of FLPMA regarding land-use planning requires the BLM to “use and observe the principles of multiple use and sustained yield. In doing so, the BLM is to use fair and balanced interdisciplinary approach, integrating physical, biological, and economic disciplines. There is no question that livestock management is a legitimate use of the public lands. Livestock grazing should be given equal consideration as other resources.

**Response:** Livestock grazing on public land is discussed throughout the Draft RMP/EIS.

**R2 Comment:** The new paper plan never said what was wrong with the old paper plan done a few years ago. The most important issues were excluded and glossed over with no specific plan to do much of anything except rid us of our public land.

**Response:** Chapter 1 identifies the purpose and needs for the plan and discusses how major issues were identified in the planning process.

**R3 Comment:** In Alternative B, certain guidelines and standards are being proposed that have not gone through the NEPA process. Although the BLM does have the ability to sign Memorandums of Understanding, enter into various agreements and contracts, and join associations, that does not necessarily legally make the policies thereof BLM poli-

cies. As such, all non-NEPA guidelines, standards, and policies must be removed from the RMP. To allow these non-NEPA special interest groups and agendas to become part of the RMP is allowing certain special interest groups undue influence in the management of the public lands managed by the DFO, BLM.

**Response:** BLM takes exception to the claim that certain special interest groups were allowed undue influence in the management of the public lands. The public involvement provided for in this process has been inclusive of any interest or person that wished to participate in the development of this plan for public lands administered by the Dillon Field Office. The Environmental Impact Statement (EIS) prepared in conjunction with the Resource Management Plan (RMP) provides the avenue under the National Environmental Policy Act (NEPA) to analyze the impacts of implementing the guidelines, standards, and policies to which the commenter refers. Chapter 4 of the Draft RMP discloses the impacts that would occur to the variety of resources and resource uses and other program areas analyzed. We do not intend to remove these guidelines, standards and policies from the plan. Upon approval of the plan and issuance of a Record of Decision, the NEPA process will be completed.

**R4** **Comment:** There is no basis for characterizing the NEPA planning process as “non-linear.” For example, it would be inappropriate to build or “Select the Preferred Alternative” prior to the following steps:

- Analyze Management Situation
- Formulate Alternatives
- Estimate Effects of Alternatives

**Response:** We are unclear as to the concern expressed by this comment. The description of the BLM’s planning process described in Chapter 1 is based on Washington office guidance provided in planning manuals and handbooks.

**R5** **Comment:** NEPA requires the BLM to “estimate and display the physical, biological, economic, and social effects of implementing each alternative considered in detail”(43 CFR Sect. 1610.4-6). Please assure that the final RMP provides this detailed information so the public can fully understand the differences between the alternatives and the tradeoffs between alternatives.

**Response:** Chapter 4 provides the analysis described in BLM’s planning guidelines and in the CEQ regulations implementing NEPA. The level of detail included in the provided analysis is adequate for the broad framework a land use plan provides.

**R6** **Comment:** The consideration of the Pioneer Mountain and Gravelly Landscape Analyses (LA’s) in the Draft RMP/EIS remains an issue unresolved in the Counties’ opinion.

**Response:** We replied to these concerns previously in the May 27, 2003 letter to the Beaverhead and Madison County Commissioners. Concerns brought up by Beaverhead County were addressed in correspondence dated 7/20/1998 and sent to the Beaverhead Interagency Steering Group.

**R7** **Comment:** The United States Forest Service (USFS) should be a cooperating agency in the preparation of this document since USFS lands and BLM lands are intertwined in the area. Companies like mine now wait for BLM to complete its own document so it can offer oil and gas leases on its lands adjacent to USFS lands where we have existing leases.

**Response:** The Beaverhead-Deerlodge National Forest was invited to become a Cooperating Agency at the beginning of this planning process in 2001. Though they declined on a formal basis, BLM and the Forest Service have continued to coordinate, both at the Supervisor’s and District Ranger organization level to provide consistency where possible. In particular, BLM has referenced the oil and gas leasing document prepared for the Beaverhead National Forest as we have developed stipulations and alternatives for leasing.

**R8** **Comment:** EPA recommends that the final EIS and Record of Decision not be completed prior to the completion of ESA consultation. If the consultation process is treated as a separate process, the Agencies risk USFWS identification of additional significant impacts, new mitigation measures, or changes to the preferred alternative. If these changes have not been evaluated in the final EIS, a supplement to the EIS would be warranted.

If proposed management direction could affect threatened or endangered species, the final EIS should include the Biological Assessment and the associated USFWS Biological Opinion or formal concurrence for the following reasons:

- NEPA requires public involvement and full disclosure of all issues upon which a decision is to be made;
- The CEQ Regulations for Implementing the Procedural Provisions of NEPA strongly encourage the integration of NEPA requirements with other environmental review and consultation requirements so that all such procedures run concurrently rather than consecutively (40 CFR 1500.2(c) and 1502.25); and
- The Endangered Species Act (ESA) consultation process can result in the identification of

reasonable and prudent alternatives to preclude jeopardy, and mandated reasonable and prudent measures to reduce incidental take. These can affect project implementation.

**Response:** A Biological Assessment was submitted to the USFWS on March 22, 2004. The Biological Opinion, dated October 29, 2004, is included in **Appendix Q** of the Proposed RMP/Final EIS. No changes have been made to the preferred alternative that would alter the USFWS findings.

**R9 Comment:** We are concerned with the way comments are being used by agencies in the decision making process. Agency management has said that the total number of comments received during the process is considered during the decision making. There is a clear indication that decisions are being made based on those interests producing the most comments. We strongly disagree with a decision-making process using comments as a voting process where the most comments wins the most trails and recreation opportunities because motorized recreationists and working class citizens have a low participation rate in NEPA processes for reasons discussed further in this letter.

**Response:** Chapter 5 of the Proposed RMP/Final EIS contains a section describing how comments on the Draft RMP/EIS have been handled. In this analysis, the substance of the comments is the main consideration as to whether changes to the Preferred Alternative were warranted.

**R10 Comment:** How many people who worked on this EIS have taken at least one college level course in ecology or wildlife management? Management decisions should be based on input from a management team that is representative of all citizen needs. This is especially necessary to provide a balanced perspective on the travel management team and when consulting and coordinating with other agencies. We request that the IDT include motorized recreation planners and enthusiasts in order to adequately speak for the needs of multiple use and motorized visitors. A multiple use and motorized recreationists advisory board could also be used to advise the IDT and decision makers.

**Response:** Interdisciplinary team members and their experience and education is provided in Chapter 5. Beyond BLM staff, the Draft RMP/EIS was developed with heavy involvement of the Western Montana RAC, and in particular, with input from a subgroup on travel management that included local users and motorized representatives.

**R11 Comment:** The BLM is strongly encouraged to immediately supplement the analysis of these

projects by formally and publicly announcing the preparation of an Environmental Assessment pursuant to planning guidance and regulation as well as pursuant to the National Environmental Policy Act.

**Response:** The Draft RMP/EIS has been prepared pursuant to BLM planning guidance and regulation as well as in accordance with the National Environmental Policy Act. See Chapter 1 for information on the planning process and Chapter 5 for information on the public involvement actions taken in developing this plan.

**R12 Comment:** There is clearly a shift in management philosophy or focus from a commodity approach to an ecosystem management approach. Expanding the management philosophy to encompass ecosystem management would include all species, including humans. Congress articulated their belief that man is an integral part of the ecosystem in the text of NEPA. Under the ecosystem management approach, humans and man's activities should be given consideration as a species and become part of the "natural" framework of disturbance events. There can be no separation of disturbance into natural or man-caused since humans are part of the natural ecosystem. Likewise, it is ethnocentric to distinguish one time period of human history as more or less natural than any other point. Given the stated approach to shift to ecosystem management and NEPA requirements, we ask that the RMP does not include the artificial distinction between "natural" and "man" caused events.

**Response:** BLM addressed this "shift" that the Counties perceive in a May 27, 2003 letter addressed to the County Commissioners. The analysis in the Draft RMP/EIS discloses impacts resulting from implementation of BLM management, using assumptions identified at the beginning of Chapter 4. It is unclear what sections of the document the comment is taking issue with since no specific sections have been identified.

**R13 Comment:** The Office of Management and Budget (OMB) has issued government-wide guidelines that "provide policy and procedural guidance to Federal agencies for ensuring and maximizing the quality, objectivity, utility, and integrity of information (including statistical information) disseminated by Federal agencies." and these "data quality" standards apply to the preparation of the Draft EIS.

**Response:** Data used in development of the RMP is subject to data standards, usually defined at the Statewide level. All spatial data used in the GIS analysis has associated metadata documenting its source and other attributes.



**R14** **Comment:** If public comments are not included in the final BLM copy BLM should explain why not. No pick and choose.

**Response:** A content analysis was conducted on the comments received on the Draft RMP/EIS and responses to summarized comments can be found in Chapter 5 of the Proposed RMP/Final EIS. All original submissions have been placed in the administrative record for the Dillon RMP. Only comments of substance that are related to the RMP have been responded to. Issues unrelated to the RMP and personal preference and opinion statements have not been responded to. This approach is in concert with CEQ guidance found at 40 CFR 1503.4.

**R15** **Comment:** Maintenance of biodiversity can minimize the need for listing species as threatened or endangered. Upland and stream corridors and special habitats (i.e., wetlands, threatened and endangered species habitat) in the planning area may need to be maintained to protect genetic diversity. The state of the art for this issue is changing rapidly. CEQ prepared guidance entitled, "Incorporating Biodiversity Considerations Into Environmental Impact Analysis Under the National Environmental Policy Act," <http://tis.eh.doe.gov/nepa/tools/guidance/Guidance-PDFs/iii-9.pdf>. We encourage the BLM to include evaluation and discussion of biodiversity considerations in the RMP and EIS.

**Response:** Standard #5 of the *Western Montana Standards for Rangeland Health* addresses the need to provide habitat as necessary to maintain a viable and diverse population of native plant and animal species.

**R16** **Comment:** Under an ecosystem, holistic or systems approach to planning, the BLM has a grave responsibility to protect public lands and consider impacts to surrounding private lands that are extensions of the same ecosystem. The planning process requires the BLM to assess, disclose and mitigate the cumulative effect of BLM and other agency actions on resources located outside public lands. A failure to adequately assess, disclose and mitigate cumulative impacts on non-BLM resources and/or a failure to implement the approved Resource Management Plan reduces the utility of the planning process to an academic exercise. The Draft EIS fails to adequately analyze and disclose the compatibility of these management decisions and actions with those of coadjacent land managers.

**Response:** A cumulative impact analysis was provided in the Draft RMP/EIS and considers impacts on non-BLM jurisdictions to the extent allowed

given the broad nature of land use plan level decisions.

**R17** **Comment:** Page 9 of the Draft RMP/EIS. Paragraph 3, Bullet 1: This bullet discusses the sideboards of Sustain Yield and Multiple Use. Traditionally, sustained yield has focused on timber harvests. The Counties believe that there are many renewable outputs that come from public lands that are important and are subject to the FLPMA sustained yield constraints. In addition to grazing and timber production, there are a variety of other important renewable resources that should be managed for "the achievement and maintenance in perpetuity of a high-level annual or regular periodic output" including big game hiding and security cover, high canopy cover sagebrush for sage grouse, watershed yield, recreation, and solitude.

**Response:** We agree.

**R18** **Comment:** NEPA mandates full disclosure and a reasoned and informed decision. From a practical standpoint, it is not possible to utilize an interdisciplinary approach with significant informational voids. To describe and understand impacts quantitatively or qualitatively, there must be an understanding on the relative size and sensitivity between the various resources and uses. The monitoring of use levels and impacts is the standard methodology of providing this information to the ID Team and the public.

Without the ability to understand the interaction between the various resources and uses, it is not possible to adequately analyze the impacts of the various alternatives and disclose those impacts to the public. This is essentially a multidisciplinary approach to planning. A multidisciplinary approach means specialists prepare the analysis and plan based on the perspective of that specialist's individual program. This NEPA planning process requires an interdisciplinary approach, a reasoned and informed decision and full disclosure to the public.

An alternative method handling these information gaps is to disclose these information gaps and that the DFO considers wildlife and recreation to be insignificant and were therefore not considered or planned for in the RMP.

**Response:** We disagree with the Counties assessment that an interdisciplinary approach was not used in developing the Draft RMP/EIS. We have expanded bullets to the section on *Availability of Data and Incomplete Information* for wildlife and recreation monitoring data as suggested by the Counties, but do not believe that lack of data has made the RMP analysis inadequate or flawed. In-

formation provided on page 265 of the Draft RMP/EIS discussed limitations on impact projections when quantitative information was not available. BLM certainly does not consider management of wildlife habitat or recreation to be insignificant, and land use plan level decisions for both are proposed in the RMP. We do not agree that other kinds of “missing information” have not been disclosed. See responses to Comments K1, and K13 (in the *Implementation, Monitoring and Adaptive Management* section, T11 and T47 (in *Recreation and General Travel Management* section), and AA25 (in the *Wildlife* section) for further discussion.

**R19** **Comment:** Section 202C(9) of the Federal Land Policy and Management Act (FLPMA) as paraphrased in the BLM Land Use Planning Handbook requires the Bureau “to provide for public involvement of other Federal Agencies and State and local government officials in developing land use decisions and must be used throughout.” Appendix C of BLM Land Use Planning Handbook Section H. Fish and Wildlife: 1.) Land Use Decisions. “Acknowledging the State’s role in managing fish and wildlife and working in close coordination with State Wildlife Agencies, describe existing and desired population and habitat conditions...” A reasonable person would translate this section to mean that the STATE WILDLIFE AGENCIES should be consulting agencies; no evidence of this consultation was evident in the RMP whether in the Bighorn sheep or West Slope Cutthroat Trout considerations. Simply compiling the document then offering the RMP to FWP after completion for review is inadequate to fully appreciate the implications of management decisions on wildlife and wildlife habitat. This lack was evident where Bighorn sheep were concerned. As primarily a land-use agency, BLM has unquestionable authority over wildlife habitat but should consult with FWP on wildlife management considerations and take the advice offered. In fact, it’s possible that BLM violated its own planning regulations. MWF is concerned about BLM’s myopic perspective when a determination of “lack of importance” when it comes to wildlife and habitat resources and must question whether this is a function of a lack of adequate consultation with wildlife resource professionals from both within or outside BLM.

**Response:** Chapter 5 of the Draft RMP/EIS describes the Consultation and Coordination efforts undertaken in development of this plan. This section, however, does not enumerate the efforts taken in coordinating with a number of federal and state agencies in regard to the RMP effort. The Montana Department of Fish, Wildlife and Parks, among many agencies, was invited to be a cooperating

agency on the RMP in August 2001 prior to scoping. As a result, FWP requested that we continue to coordinate with their Region 3 office, but declined the invitation to be a formal cooperating agency. Nevertheless, meetings with FWP staff, including wildlife resource professionals and others (access coordinators, river managers, etc.) regarding the RMP occurred at various intervals throughout development of the document. In addition, the FWP representative on the Western Montana RAC was able to provide that agency’s perspective during the discussions and work completed by the RAC regarding the RMP.

FWP involvement often revolved around issues of particular concern to them, including travel management where FWP provided one of the members of the RAC’s Travel Management subgroup. Based on the level of involvement given to FWP as described above, we think we have coordinated and consulted with FWP to an appropriate degree.

**R20** **Comment:** On page 11, BLM indicates they are going to disregard the Mountain Foothills Grazing EIS done in 1980. It is recommended that the Mountain Foothills plan as far as wildlife concentrations be maintained and improved on but not deleted in any way.

**Response:** Page 11 of the Draft RMP/EIS identifies those plans, including the Mountain Foothills Grazing EIS, which are part of the planning base for the Dillon Field Office. The RMP will replace the Dillon Management Framework Plan approved in 1979, not the Mountain Foothills Grazing EIS. While the Mountain Foothills Grazing EIS will not be disregarded, circumstances have certainly evolved since the completion of the grazing EIS in 1980 and those changing circumstances have been considered in the Dillon RMP process.

**R21** **Comment:** We do not understand why the public’s needs do not carry any weight in the process. Why is it acceptable to make decisions that fly in the face of the public need? It appears to be done as conscious and organized efforts to eliminate a sector of the public from public lands. The needs of the public are being ignored in favor of a management agenda that is contrary to the needs of the public. Priorities for management of public land have swung to this ridiculous extreme. We request that the hidden agenda of closure of motorized roads and trails which is so contrary to the needs of the public be addressed and corrected.

**Response:** Chapter 5 of the Draft RMP/EIS describes the public participation processes used in this planning process, including the use of a subgroup of the Western Montana RAC to develop an alternative regarding travel management for inclu-

sion in the plan for public comment. We do not agree that using this approach resulting in ignoring the needs of the public.

**R22** **Comment:** I incorporate by reference and include the following attachments which are an integral part of my public comments. I expect these legitimate public comments to be fully evaluated and given the consideration deserved.

- Paul Richards' March 2, 2003, 1:16 a.m., comments.
- Paul Richards' July 3, 2004, 10:49 a.m., comments.
- Wilderness Society's July 1, 2004, 11:39 a.m. "WildAlert."
- Michael Garrity's June 9, 2004, 2:14 p.m., "Sage-Steppe Grasslands."
- Tim Stevens' and Shawn Regnerus's July 2, 2004, "Resource Management Plan Comments."

Please incorporate all of these comments into the Dillon Resource Management Plan.

**Response:** Comments submitted as part of the planning process but prior to release of the Draft RMP/EIS were used as the RMP was developed to ensure issues within the scope of the land use plan were addressed and to assist in alternative development and impact assessments. However, their utility as comments specific to the Draft RMP/EIS is limited since they were not developed in relation to the alternatives and impact assessment included in the document issued for review. See the listing for The Ecology Center, Greater Yellowstone Coalition, and Predator Conservation Alliance for responses to those comments.

**R23** **Comment:** Why use so many indirect attempts such as public meetings and open houses to gather feedback from motorized recreationists? Why not just go directly to motorized recreationists in the field and at club meetings and ask them? NEPA encourages direct coordination with the impacted public instead of a process tailor made for special interest environmental groups.

**Response:** The Preferred Alternative (Alternative B) released in the Draft RMP/EIS for public review was developed by a subgroup of the Western Montana RAC that was comprised of a diverse set of citizens representing many interests. This subgroup includes local users and motorized representatives. BLM agreed to this process in order to involve the public directly in the formulation of the plan. Subgroup members were tasked with keeping their constituencies informed throughout the process.

**R24** **Comment:** When asking for public comments and participation in the process, provide for different methods of advertising meetings and intents to the general public. One notice in the paper is insufficient.

**Response:** Besides press releases to the public, BLM used radio announcements, trailers on local TV channels, flyers distributed throughout local communities, and individual mailings to over 600 contacts on the RMP mailing list. Notices for meetings convened by non-BLM sponsors were not subject to BLM approval.

**R25** **Comment:** I have never seen a BLM person at a Sportmen's meeting in 12 years. BLM should bring their maps put them on the wall and ask sportsmen where they see access problems one meeting just on this subject.

**Process:** Several meetings were convened to provide opportunities for this type of input as BLM conducted scoping and developed alternatives prior to release of the Draft RMP/EIS. **Appendix B** lists several of these opportunities. BLM will continue to work with the public, government agencies, and private landowners on access issues through implementation of the plan, once approved. BLM staff is happy to attend organizational meetings when invited and schedules can be arranged.

**R26** **Comment:** Non-motorized users represent the majority of recreationists in the State of Montana, yet we have been left out of the planning process.

**Response:** The BLM does not agree that non-motorized users have been left out of the planning process. The commenter is encouraged to review the steps that BLM took in providing public involvement opportunities in the RMP planning process (see Chapter 5).

**R27** **Comment:** The public was not adequately notified that the RMP includes a travel plan action and subsequently, the public was not adequately involved in the development and selection of the preferred alternative. In order to adequately involve and address the needs of the public, the travel plan portion of the project should be separated out as a separate action over a greater period of time and with far greater involvement with motorized recreationists.

**Response:** Since the initiation of this planning process in 2001, the record shows that the public was informed on numerous occasions that the Draft RMP/EIS would address travel planning and route designations. Travel management was selected by the Western Montana RAC as a leading issue in which they and their constituencies wanted to be

involved. Scoping meetings in 2001, an Information Fair in 2002, and alternative development workshops in 2003 provided numerous opportunities for the public to be involved. Finally, a representative from one of the commenter organizations (representing motorized recreation) was intimately involved in route designation deliberations and chaired the subgroup convened by the Western Montana RAC.

**R28 Comment:** The contents of Chapter 3 are difficult to follow. I finished what I thought was one resource and lo and behold there was another “section” on the same subject and then I had to rethink the whole thing.

**Response:** The Draft RMP/EIS was organized in accordance with direction contained in the BLM Land Use Planning Handbook, H-1601-1, in order to give RMPs prepared across the Bureau a common look and feel.

**R29 Comment:** I was unable to locate the current set of best management practices (BMPs) that Dillon follows for road construction and maintenance, livestock grazing, silvicultural activities, etc. Are these available?

**Response:** We have added a section on Best Management Practices to the Proposed RMP/Final EIS (see **Appendix Q**).

**R30 Comment:** Volume II (Appendices). This document fails to mention all the laws BLM is currently mandated to follow. Insert: (1). Unlawful Inclosures (it is an “I” rather than “E” in the Law) of Public Lands Act, 43 USC 1061-1064. Stat. L. 321. Ch. 149 (2). Freedom of Information Act 5, USCS 552; 80 Stat. L. 250; Pub. L. 89-487, July 4, 1996.

**Response:** We have added the two laws mentioned in the comment to **Appendix A**.

**R31 Comment:** There is a total lack of reference to the impact of six years of continued drought. Drought alone is identified by biologists as the single largest known detriment not only to sage grouse, but all species. Drought has taken it’s toll ecosystem and landscape wide, yet goes unmentioned.

**Response:** The RMP focuses on planning for things over which BLM has jurisdiction, and the climate is not one of those things. However, please see discussion under responses to Comments G3, I4, I19, I27, N28, U12, Z7 and AA35 regarding drought.

## RANGELAND VEGETATION

**S1 Comment:** The Counties understand the SIMPPLLE analysis ranked the alternatives as follows:

1. Alternative D
2. Alternative B
3. Alternative C

Reviewing Table 13 - Summary Comparison of Impacts and listening to the DFO staff describe the alternatives at the various public meetings gives the impression of the following ranking:

1. Alternative C
2. Alternative B
3. Alternative D

The Draft EIS is silent as to how this is possible.

**Response:** Page 15 and 16 of the Draft RMP/EIS describes how alternatives were developed and their general emphasis. Given the interdisciplinary approach used, it is not unusual for preferences based on particular resources (in this case, vegetation) to change when other resource considerations are added to the mix. The first ranking list referred to in the comment is based on the number of acre that could be manipulated within the alternatives, with Alternative D containing the most amount of acreage and C the least amount to be treated. Because an interdisciplinary process was used, the incorporation of the information from the Alternative B model run was placed in the Preferred Alternative to accommodate other resource concerns beyond the management of vegetation. Table 13 of the Draft RMP/EIS compares the impacts by looking at the time necessary to achieve Desired Future Conditions. We are not aware of “ranking” the alternatives during the public meetings held on the Draft RMP/EIS other than to identify the Preferred Alternative (Alternative B) and provide information on what the other alternatives contained. The second listing or ranking represents, as discussed in Table 13, how soon each alternative would be expected to reach desired future conditions.

**S2 Comment:** It does not appear that all the analyses in Table 13, Summary Comparison of Impacts, were completed utilizing the ID Team selected state and transition model.

**Response:** The SIMPPLLE analysis process does basically use the state and transition theory of vegetation modeling. We did use the SIMPPLLE analysis to complete a portion of the vegetation potential and analysis. We did not use state and transition theory for all aspects of the analysis and so this model was not used throughout the entire document. The Clementsian and state and transition theories for ecosystem description are differ-



ent as described by the commenter, however they are not totally different systems. The base of any rangeland ecosystem is the soil resource that has developed through time from a specific parent material, climate, landscape position, and interaction with soil and terrestrial biota. While it appears that the state and transition theory is better adapted to describe vegetative systems there are still components of Clementsian theory within a state and transition model as has been described in the literature.

**S3** **Comment:** The draft RMP proposes to manage vegetation to reduce fuel loads through controlled burns and timber harvest, but doesn't say whether this will lead to road construction and a net increase in the miles of open roads or a net decrease in the extent of sagebrush habitats.

**Response:** A discussion of how the BLM will treat "new roads" is included in both the *Transportation and Facilities* section and in the *Travel Management and OHV Use* sections of Chapter 2. We have clarified the language in the Proposed RMP/Final EIS. It says in part, "When wildlife displacement, habitat fragmentation, road density, or other resource issues are identified in regard to "new roads", the road system would be managed to maintain no net change in "open" roads over the long term, with the baseline identified as the number of miles designated open in the selected alternative". Generally, roads will be closed and reclaimed following the completion of the project, unless needed for the permanent transportation system. There will be a change of seral stage of sagebrush stands and as indicated on page 307 of the Draft RMP/EIS, sagebrush stands that are currently being lost to conifer encroachment would be restored to a sagebrush grassland habitat.

**S4** **Comment:** There appears to be a tendency throughout the EIS to interchange habitat types with vegetative community types. These two ecological terms do not necessarily mean the same thing and they should not be used interchangeably.

**Response:** Community and habitat types are closely related. Community type is a seral stage or subunit of a habitat type.

**S5** **Comment:** The RMP states the Standards for Rangeland Health apply to all uses and/or users of the range resource, and we believe further clarification should be provided on application of the Standards and Guidelines to other uses.

**Response:** The Standards for Rangeland Health do apply to other uses. The BLM handbook for Rangeland Health Standards provides for application to all uses and states "If the Land Health Stan-

dards are not being achieved because of a causal factor other than current livestock grazing management, you must consult other program guidance for the appropriate steps to be taken to ensure that progress toward meeting Standards is made." The handbook further states "Implement actions or appropriate interim measures as soon as practicable, but, in the case of livestock grazing, no later than the beginning of the next grazing season."

**S6** **Comment:** What kind of sagebrush steppe management does the preferred alternative really allow in regard to insuring that we have the ability to actively manage for sustainability in the future and manage for other obligate species and uses?

**Response:** We have clarified the general sagebrush steppe habitat management described on pages 22, 23, 33 and 34 and in Table 12 of the Draft RMP/EIS. The site specific areas and tools will be defined in the management plans that will be developed following watershed analysis.

**S7** **Comment:** There should be special consideration for basin big sagebrush habitats (*Artemisia tridentata tridentata*).

**Response:** The basin big sagebrush habitats are part of the Sagebrush Steppe habitat that has a number of management actions applied as described in Chapter 2 on pages 22, 23, 33 and 34 of the Draft RMP/EIS.

**S8** **Comment:** Inadequate attention has been paid to special status species especially sagebrush dependent species such as sage grouse, sage thrasher, sage sparrow and pygmy rabbit. Since the DFO contains some of the best remaining sage habitat in southwest Montana, MWF believes it is incumbent upon BLM to take proactive measures to ensure that these ecosystems remain intact.

**Response:** See the response to Comment AA34.

**S9** **Comment:** The proposed management of the sagebrush steppe habitat under Alternative B gives percentages for portions of the habitat to be in certain sagebrush canopy cover classes. A high percentage of the sagebrush habitat desired will fall into late seral and post climax conditions to satisfy nesting/early brood rearing habitat requirements of the sage grouse. From a sagebrush habitat sustainability point of view, diversity in structure and composition is being lost as the brush matures and the herbaceous component recedes.

**Response:** The sagebrush canopy coverage ranges from five percent and above which does allow for a range of seral stages across the landscape. The densest sage is targeted for sage grouse nesting and early brood rearing areas. Please note that the in-

dicators of upland functionality in the *Western Montana Standards for Rangeland Health* include language for diversity in structure and composition.

- S10** **Comment:** Fall sagebrush burns are hotter and do more damage to the ground, and grass vegetation doesn't come back nearly as well. Spring burns have historically worked better for burning sagebrush.

**Response:** We agree. Fall burns are hotter and fewer opportunities are available within prescription windows for burning. We will be able to do some spring burning if concerns can be mitigated. The mitigation would be with such things as burning prior to the nest season or applying scale limits to the amount burned. We have adjusted language in certain sections of the Proposed RMP/Final EIS to ensure spring burning is not precluded.

- S11** **Comment:** The authors of this RMP used a blanket 7" herbaceous height in breeding habitat with the majority of the area being in a >15% brush canopy cover (Class 4 and 5) with at least a 30% canopy cover of grasses and forbs. The authors are blindly following some guideline that truly does not fit our area and will result in removing livestock use with no substantial benefit to the sage grouse. A 7" requirement is an abuse of the WAFWA Guidelines. A 7" requirement would virtually eliminate livestock grazing.

**Response:** The Draft RMP/EIS recommends that the Management Plan and Conservation Strategies for Sage Grouse in Montana, including all WAFWA guidelines and recommendations, will be used as the basis for evaluating the effects of proposed management on sage grouse. Site specific activity planning will identify where the guideline is applicable and how it may influence authorized land uses. We have attempted to clarify that the 7" guideline or any of the other guidelines will not be applied as standards in the Proposed RMP/Final EIS.

- S12** **Comment:** We did not find any discussion within the Draft RMP/EIS concerning wildlife use of the grazing resource.

**Response:** The allocation of forage to livestock and other uses, including wildlife, was completed in the Mountain Foothills EIS. Approximately 80% of the total vegetative production was allocated for plant maintenance, watershed protection, wildlife habitat and other multiple uses besides livestock grazing. There is sufficient forage available for wildlife uses when the total production is considered.

- S13** **Comment:** Sagebrush habitats throughout the Dillon Field Office (DFO) have been manipulated to increase forage for domestic livestock, and in comparison to other places outside the planning area, few large, extensive stands of sagebrush remain. The DEIS claims that the main management threat to sagebrush communities is typically heavy grazing. Additionally, since the continued "management" of sagebrush has led to many of the situations scientists now agree are threatening these ecosystems, the removal of livestock from sagebrush communities in less than satisfactory condition should be a seriously considered alternative in the RMP.

**Response:** The DFO has approximately 544,000 acres of sagebrush types (Table 22, page 197) and has done some type of vegetation manipulation on approximately 98,000 acres (Table 33, page 211) which amounts to 18% of the DFO sagebrush types. The vegetation manipulation has taken place between 1957 and 2000 with most being done in the 1960's. Some of the manipulation acres are double counted because multiple projects occurred on the same acreage such as a burn and seeding or a spray and a seeding. Therefore, the BLM has manipulated little of their sagebrush stands and most of what was manipulated has returned to pretreatment conditions. The No Grazing alternative was analyzed in the Mountain Foothill EIS. Compared to other areas within the region, the sagebrush habitat within the DFO is relatively intact.

- S14** **Comment:** In the RMP the vegetative prescriptions for the sagebrush landscape are being micromanaged via sage grouse needs as determined by biologists, not based on sustainable sagebrush habitat needs recognized by range ecologists. The overall sustainability and health of the habitat should take precedence over any species or use and the BLM is mandated to this management dictum. It is imperative that the habitat be managed for the majority of the particular obligates and uses.

**Response:** See the response to Comment AA40.

- S15** **Comment:** No sagebrush burning should be allowed.

**Response:** Eliminating a tool such as sagebrush burning across the entire planning area in all instances is not wise management.

- S16** **Comment:** The sagebrush canopy cover classes from Oregon that are being used for Montana in this document seem to be overlapping as to percentages, unless there is an error. On page 20 of Volume II, Class 3 is from 5-25% and Class 4 is from 15 to 25%. It makes more sense if Class 3 went from 5-15% rather than from 5 to 25%.

**Response:** Class 3 should have been from 5-15% in the Draft RMP/EIS. However, the cover class descriptions from southeast Oregon that appeared in **Appendix D** have been removed from the Proposed RMP/Final EIS.

## RECREATION and GENERAL TRAVEL MANAGEMENT

**T1** **Comment:** By setting aside areas for non-motorized use now, the BLM will circumvent many of the problems that are now plaguing areas where the number of recreationists have reached critical mass. I think there are spots where there needs to be accessible non-motorized use, especially in the winter. There are plenty in the summertime but nothing in the winter. Alder Gulch would be a great place to start. You can still have snowmobiles on the road but there is BLM land leading all the way from Virginia City into the national forest and BLM could build a trail there.

**Response:** The *Travel Management and OHV Use* section of this plan identifies areas for both motorized and non-motorized recreational use, and the *Recreation* section identifies a non-motorized recreational emphasis for a number of Special Recreation Management Areas. Route designations for wheeled motorized travel identify only those routes open to motorized recreational use. Routes that are not identified for motorized travel are available only for non-motorized travel. Although BLM already had areas designated closed to snowmobile use in the winter (i.e. - Centennial Mountains WSA, Hidden Pasture Creek WSA, East Fork Blacktail Deer Creek WSA, and the Bear Trap Wilderness), additional areas have been closed to snowmobile use in this plan to accommodate non-motorized winter recreational use and provide additional winter security for wildlife. See the *Travel Management and OHV Use* section in Chapter 2, Alternative B, for additional areas closed to snowmobile use under this plan. Finally, the lands leading from Virginia City into the National Forest include a mix of private and BLM lands. The suggestion to provide separation of motorized and non-motorized winter recreation opportunities here will require site-specific planning and coordination with the affected landowners and recreation interests in this area.

**T2** **Comment:** We recommend the BLM utilize the same time period restrictions used by the USFS for public camping. We understand the USFS uses 16 days and the BLM 14 days. This would help clear up any confusion with the public and would likely make enforcement easier.

**Response:** Stay limits for public camping are es-

tablished by regulation, and not normally prescribed in land use plans. We agree this would clear up confusion, but this would require coordination with other land managing agencies as well as other BLM offices in Montana outside of this land use planning process.

**T3** **Comment:** The Planning Team must formulate at least one Alternative that emphasizes Roded Natural and Semi-Primitive Motorized opportunity settings for recreation. This alternative should strive to provide management areas designated for all-terrain/Off-Highway vehicle routes. Such Alternative should provide for education programs and service programs to utilize features of the area for the best possible recreation use. This emphasis should be a key part to avoiding social user conflicts by providing education to users so they utilize the lands suitable for their mode of recreation. The Planning Team is encouraged to formulate at least one Alternative that maximizes recreational opportunities in the Planning Area. The Planning Team should formulate an Alternative that maximizes all existing recreational opportunities, as well as anticipates and plans for an increase in recreational use in the future.

**Response:** There certainly is no requirement for the BLM to formulate alternatives to emphasize any particular Recreation Opportunity Spectrum (ROS) opportunity class on a planning area level. By definition, any lands not identified to be within a Special Recreation Management Area (SRMA), are by default part of the Extensive Recreation Management Area, or ERMA (BLM Planning Handbook H-1601-1, **Appendix C**, Page 12). Although the ERMA is not described in the plan according to any particular ROS setting, it could certainly be described as "Roded Natural" or "Semi-Primitive Motorized." The ERMA for this plan encompasses nearly 735,000 acres of the 900,000 within the planning area. In addition, the proposed South Pioneers SRMA is identified as an area where motorized recreation will be emphasized.

In the *Management Common to All Alternatives* section under *Recreation* (page 54 of the Draft RMP/EIS), it says, "Emphasis would be placed on providing interpretive and informational signs and materials for public lands visitors..." These materials would be designed at least in part to minimize conflicts among users and provide guidance on appropriate uses. To "maximize recreational opportunities" across the planning area would appear to imply changing the nature of those recreation opportunities to eliminate areas where there would be opportunities for solitude or certain types of "quiet recreation." Maximizing recreation opportunities either implies moving toward a crowded

condition throughout the planning area, which was not identified by the public as a desirable goal, or maximizing the diversity of recreation opportunities, which all of the alternatives strive to achieve.

While no alternative “maximizes recreational opportunities,” Alternative D provides for higher levels of outfitted hunting use, no establishment of use levels for BLM launch sites (fishing access sites), and development of additional recreational facilities. All of the action alternatives also identify possible development of trails for both motorized use (in the South Pioneers SRMA) and mountain bike use (Rocky Hills SRMA) in anticipation of growing demand for these types of recreation. All action alternatives also include a potential expansion of the cabin rental program on BLM lands and prioritized development of hiking/equestrian trails.

**T4 Comment:** Recreation: Eliminating opportunities does not solve problems. A more reasonable approach is to address problems through mitigation measures such as education, signing and structural improvements such as water bars, trail re-routing, and bridges. Suggestion: If significant degradation is documented related to certain motorized roads and trails, then the BLM should work to solve the problem with mitigation and not to compound the situation by enacting more closures.

**Response:** Eliminating opportunities for some creates opportunities for others. The designation of motorized routes in this plan generated a relatively balanced public response – some suggesting there was too much motorized use, and others suggesting there was not enough. The route designations proposed in this plan are largely the result of an effort by the BLM’s Resource Advisory Council, through a subgroup representing the diverse interests of the public, to manage motorized travel in this planning area. An effort was made to ensure reasonable opportunities for motorized access into the public lands while balancing that with concerns over resource degradation (including spread of weeds, wildlife habitat fragmentation, etc.) and recreational user conflicts. Clearly, there is no single correct answer. The designations made in this plan represent a balanced approach in addressing the diverse concerns of the public and the needs of the resources. We have made adjustments to Alternative B in the Proposed RMP/Final EIS to address concerns regarding specific areas and routes.

**T5 Comment:** Travel management “should incorporate planning for all forms of transportation, both motorized and non-motorized, as well as identification of specific resource issues, concerns and needs with a plan that responds to those issues in a substantive way.

The DEIS fails to even mention how it is considering or incorporating non-motorized recreation into its’ decision-making. Travel management in the draft is treated as if motorized use were the only thing that were being addressed, despite the fact that 90% of all trail users in Montana access trails under their own power. There should also be specific places where non-motorized users, during all seasons, can access country where they can be confident that their experience will not be degraded by motorized vehicles. This requires the BLM to specifically identify areas, on a map, where non-motorized use will occur, free of motorized vehicle use. Non-motorized recreationists will seek these places out. This is the direction that the Beaverhead-Deerlodge National Forest is moving in. Therefore, from a consistency in management perspective, it is important that the BLM look at travel management in the same way.

**Response:** The travel management section does incorporate planning for both motorized and non-motorized recreation. Routes not designated open to motorized use are available to non-motorized use. In addition, non-motorized trails are identified in the Centennial Mountains, East Fork Blacktail Deer Creek, and the Ruby Mountains. Under all alternatives, a minimum of nearly 47,000 acres are officially closed to motor vehicles (acreage adjustments made for Alternative C identify approximately 93, 245 acres closed under the OHV regulations in 43 CFR 8342.1). The Bear Trap Canyon Wilderness, the Centennial Mountains, East Fork Blacktail Deer Creek, and the south half of the Blacktail Mountains WSA were all closed to all motor vehicles yearlong in the Draft RMP/EIS. In response to this and other similar comments, additional areas have been identified that would be closed to snowmobile use to provide non-motorized winter recreation opportunities and additional winter security for wildlife. These areas include the Ruby Mountains WSA, the remainder (north half) of the Blacktail Mountains WSA, and an area near Bachelor Mountain in Upper Horse Prairie. Another single section was closed to snowmobile use in the East Fork Little Sheep Creek area to be consistent with the management of adjacent Forest Service lands.

**T6 Comment:** In all of the proposed alternatives the BLM has failed to address the impact of snowmobile use on other recreationists.

**Response:** In accordance with NEPA and other pertinent regulatory guidance (40 CFR 1508.8), impacts, or “effects” to be analyzed within an EIS are those anticipated to result from the management actions proposed within an alternative – not the impacts of an existing situation, which in essence becomes the baseline for analysis. The only



alternative that proposed any action other than the existing situation regarding snowmobile use was Alternative C, which proposed the closure of all WSAs to snowmobile use. You are correct that the analysis of the impacts to recreation as a result of that action were inadequately analyzed. The analysis of the impact of that action in Alternative C has been expanded to resolve your concerns. In addition, in light of changes to Alternative B regarding snowmobile use, which has become the Proposed Action in the Proposed RMP/Final EIS, additional analysis has been provided in the analysis of recreation impacts in that alternative as well.

**T7** **Comment:** While the DRMP identifies for all alternatives 46,976 acres as “closed” to all motorized use (these areas are already currently closed), it has the following qualifier—“Although some of these areas contain short segments of roads which will continue to be open to vehicles at least seasonally, these road segments do not provide access to the majority of acres in the areas identified as closed.” (p. 58) In other words, these areas, with the exception of the designated wilderness, are not really motor-free.

**Response:** The areas identified as “closed” are those areas where the clear and vast majority of the acreage within that polygon is closed to all motorized vehicles. This requires some reasonable level of judgment. With the addition of several areas closed to snowmobile use in the proposed action (Alternative B in the Proposed RMP/Final EIS), that acreage has been adjusted to 74,350, but the same caveat exists.

**T8** **Comment:** The BLM must take a more balanced approach to snowmobile use in the RMP revision. To start, we again reiterate here that designating all of the Wilderness Study Areas for non-motorized use only is a good place to start. These lands already have additional restrictions on them due to the IMP, and therefore seem a logical place to start the discussion.

**Response:** Additional areas have been identified to be closed to snowmobile use in consideration of this, and other similar comments. However, all WSAs have not been closed to all motorized use for various reasons explained in the response to other comments. For instance, see responses to Comments T37 and CC15.

**T9** **Comment:** Bell-Limekiln. We appreciate and support the commitment to manage this WSA to “emphasize restoration and maintenance of natural processes and conditions.” We also support the ROS designation of ‘semi-primitive, non-motorized’, but don’t see that reflected in Alternatives B or C.

Motorized access to the WSA appears to be adequate from all four directions, and this area, as with all WSA’s, should be available as a non-motorized refuge that is surrounded by motorized use. The Bell-Limekiln is within the Blacktail ACEC linkage, and we also ask that the provisions outlined in that nomination apply here.”

**Response:** The *Recreation* section of the Draft RMP/EIS (page 55) says, “Areas identified for non-motorized recreational emphasis will continue to allow motorized access consistent with the approved route designations for those areas, but will not favor management activities that encourage increased motorized recreational use.” It is our intent to manage Bell/Limekiln, and other WSAs, to emphasize non-motorized recreation opportunities even if they are released from further consideration as wilderness. In the interim, we will manage them in accordance with the *Interim Management Policy for Lands Under Wilderness Review*, or IMP (BLM Handbook H-8550-1). Specific guidance provided in the IMP makes it clear that there could be “existing facilities” within WSAs, including “primitive vehicle routes,” and that “they may be used and maintained as before, as long as this does not cause new impact that would impair the area’s wilderness suitability” (page 12 of the IMP). Section 603 of FLPMA makes it clear that Congress did not intend for the BLM to manage WSAs as if they were already designated wilderness, but rather to ensure that the wilderness conditions present at the time of the inventory were not degraded until such time as Congress had the opportunity to designate areas they determined were appropriate for inclusion in the National Wilderness Preservation System. If a use (including motorized vehicle travel) was occurring at the time of the wilderness inventory, and the area still appeared to have wilderness character, it is presumed that that use could continue to occur during interim management without impairing the wilderness character. If impacts from use change significantly enough to begin to impair wilderness qualities, BLM has the authority under existing regulations to close that area to the kind of use that is causing the impairment. (The Blacktail ACEC Linkage nomination was determined not to meet the relevance and importance criteria, and was not carried forward for further consideration as an ACEC.)

**T10** **Comment:** Numerous comments were received regarding travel planning in general – ranging from “motorized use should not be restricted anywhere” to “all motorized use should be eliminated, at least in all the WSAs” and all points in between.

**Response:** The one clear message from all the responses we received on the Draft RMP/EIS is that

we will never all agree on the ideal composition of motorized and non-motorized recreation areas and opportunities. The Proposed Action in the Proposed RMP/Final EIS is an attempt to incorporate the concerns of both motorized and non-motorized recreational interests expressed in response to the Draft RMP/EIS. Numerous specific adjustments were made to route designations (see the *Route Designation* section of *Comments and Responses*) and additional areas were identified to be closed to snowmobile use in response to these comments. We believe that this represents a fair and balanced travel plan that accommodates the divergent interests to the greatest extent possible within the context of this plan.

**T11** **Comment:** Use levels of non-guided recreation. The DFO speculates that recreation use and impacts are increasing, but has no comprehensive reliable data or estimate of historic or current use levels by area, season, activity, etc. to formulate such a speculation.

**Response:** The DFO makes an annual report of recreational use visits in the BLM's Recreation Management Information System. These reports have shown a dramatic increase in recreational visits over the last five years. Although we have readily acknowledged a level of discomfort with the accuracy of the numbers reported, they are based on a number of data collection methods including road traffic counters, trailhead registers, actual vehicle counts at developed and semi-developed recreation sites, and visitor use estimating formulas included in the Recreation Management Information System. This is the best available information for local recreation visitation of BLM lands. The "speculation" that recreation use and impacts are increasing is also supported by extensive anecdotal accounts by local residents and numerous national and regional research efforts which show increased participation in many outdoor recreation activities and significant regional population growth.

**T12** **Comment:** Impacts or monitoring of recreation – Impacts attributable to recreation are not currently quantified. Without this information impacts cannot be quantified or described qualitatively.

**Response:** While impacts attributable to recreation may not be "quantified," (say in terms of the number of acres disturbed that are directly attributable to recreation use), they are readily apparent. Given the current estimated levels of recreation use, and projecting an increase in use certainly allows a reasonable qualitative description of projected impacts that are likely to result from recreation use.

**T13** **Comment:** We suggest that management direction for recreation include specification that campground facilities and concentrated public recreational uses should be located away from ecologically sensitive areas, such as riparian areas and wetlands or areas with erosive soils as much as possible. We encourage restricting motorized access to camping sites in ecologically sensitive areas, and identifying and designating camping sites to avoid sensitive areas and/or to encourage camping or concentrated public use in areas that are more resilient and can more easily recover from impacts and/or accommodate public use with less impact. For example, including management direction language such as "Campground facilities and concentrated public recreational use areas should be located away from ecologically sensitive areas and located in areas that are more resilient and can more easily recover from impacts and/or accommodate public use with less impacts."

**Response:** The emphasis in the Recreation Management portion of this plan is to provide information and interpretation for recreational visitors, and to minimize the development of new recreational facilities. If any additional campgrounds are proposed over the life of the plan, any environmental assessment of those site-specific proposals will certainly consider the impacts to ecologically-sensitive areas. The recently completed Lower Madison Recreation Management Plan has attempted to deal with some of the camping concerns in our most heavily used area for recreation, by limiting camping to designated sites and developed campgrounds.

**T14** **Comment:** The RMP fails to adequately discuss the significant contribution of Clark Canyon Reservoir to the Beaverhead River fisheries, water quality, watershed importance, recreation, and the Lewis and Clark Trail. This is important as many of BLM's management proposals are directly tied to the Beaverhead River.

**Response:** The management, operation and maintenance of Clark Canyon Reservoir are outside the scope and authority of the BLM Dillon Field Office. BLM's management actions will not affect operations of the Clark Canyon Dam or their recreation management. See the responses to Comments D3, F5, and Z11 regarding other values.

**T15** **Comment:** The dRMP fails to anticipate the likely significant increase in recreation in southwest Montana over the next decade. Citizens are already experiencing increasing conflicts between hikers, hunters, horseback riders, anglers, ORV users and other outdoors enthusiasts. TWS anticipates that

these conflicts will continue. The final RMP must address this issue.

**Response:** The BLM and USFS in this area have already begun to jointly address some of these conflict issues with the limitation of off-highway vehicles to existing routes. The identification of routes designated for motorized use, which both agencies are pursuing through their land use planning processes should further reduce conflicts between motorized and non-motorized recreationists where the highest levels of reported conflict exist amongst recreation users. The BLM has also proposed (in both the Draft and Proposed RMPs) to work collaboratively with Montana FWP to establish appropriate use levels for BLM-managed launch sites to address crowding conflicts on waterways where necessary.

**T16** **Comment:** The BLM decision must take into account that the current allotment of resources in Forest Service Region 1 is unbalanced with 5,935,000 acres out of 25,157,000 acres or 24% of Region 1 in wilderness designation of some sort while only 2.55% of the visitors are wilderness visitors.

**Response:** No additional lands have been designated as wilderness in this plan. Land use plans prepared by the BLM do not readdress wilderness recommendations.

**T17** **Comment:** Executive Orders 11644 and 11989 promote intolerance and non-sharing in a manner that allows one group of recreationists to eliminate another group of recreationists from public lands.

**Response:** BLM is required to abide by these Executive Orders. We have made an effort to allocate lands for both motorized and non-motorized uses.

**T18** **Comment:** The National Trails System Act was the authorizing law for the CDNST. While the language used in the Act stated “the use of motorized vehicles by the general public along any national scenic trail shall be prohibited” an exception is specifically made in the case of the CDT. The closure of motorized sections of the CDT is not consistent with the intent of the original act which specifically allowed motorized use to continue in those segments with existing motorized use.

**Response:** The portion of the Continental Divide National Scenic Trail managed by the BLM within this planning area goes through the Centennial Mountains in an area that has been closed to motorized use since approximately 1975, well before the designation of the CDT through this area.

**T19** **Comment:** The borders of BLM lands in many areas need to be marked so that the recreating public can access without intimidation. This is especially important where ranchlands border BLM. Some areas in this region that need this attention are the Greenhorn along Maloney ranch, the Tobacco Root along Van Nice Ranch, and the Ruby Mountains along the west edges.

**Response:** BLM makes an effort to sign public lands where necessary, and where possible given staffing and funding constraints. Decisions regarding placement of signs is not made at the land use planning level. This comment was passed on the field staff for consideration and possible action.

**T20** **Comment:** Recreation. As you are aware from RAC discussions, we do not feel this RMP really has much of a long-term “plan” nor anticipates the impacts likely to be hitting the DFO from increased recreational use. As we stated in the “Weeds” section, BLM lays out specific actions and proposed actions often to be administrated on a site-specific, or need-based basis for every other resource—why not the two with the most potential to do the most damage? We wonder if BLM really even understands how great the impact already is given increased hunter numbers, greatly increased mobility with 4-wheelers, snowmobiles, even bikes. BLM needs to fly over the DFO after hunting-season and observe and photograph the wheel tracks—in other words—monitor the situation: areas of heaviest use, highest potential of weed outbreaks, heaviest disturbance to sensitive species and riparian areas, etc., then figure out how to minimize it, whether it be travel management enforcement, special area designations, road or area closures—or even positive actions that encourage private citizens and user groups to become partners in planning, prevention, and stewardship.

**Response:** BLM does anticipate increases in recreational use, and provides some measures within this plan to address this use, including the emphasis on information and educational materials, cooperation with FWP to address crowding issues on area rivers and designation of three new Special Recreation Management Areas to focus on the demands for motorized use (South Pioneers SRMA), mountain bike use (Rocky Hills SRMA), and additional hiking/equestrian use (Ruby Mountains SRMA). In addition, recent actions to limit OHV use to existing routes (through the joint Statewide BLM/FS OHV EIS) and actions within this plan to further limit motorized vehicles to designated routes is intended to address concerns over the types of recreational impacts you describe. In the end, much of the success of these efforts will de-

pend on our ability to gain compliance through our information/education efforts, and ultimately on our ability to enforce restrictions provided by this plan.

**T21 Comment:** Page 120, Chapter 2, contains an archaic proven-to-fail management proposal that is common to all alternatives. It reads: “Across all alternatives BLM will promote the use of shared trails whenever possible.”

The presence of motorized traffic on a route makes a motor free, quiet-trail experience impossible. While motorized drivers are not displaced or disturbed by hikers, mountain bikers, and skiers, the opposite is true for these quiet-trails users.

For the agency to truly provide for the non-motorized part of the Recreation Opportunity Spectrum, quiet-trails users need to have trails available that are not within hearing range of motorized routes.

A true motor-free experience starts at the trailhead. In order to experience a motor-free outing, on BLM lands quiet-trails users must first run the gauntlet of a motorized route.

In the same list of common management schemes the agency proposes the construction of motorized and/or mountain-bike routes. While mountain bikes are not permitted in designated wilderness, mountain bikers are quiet-trails users and should not be lumped in the motorized traffic.”

**Response:** The proposal to promote the use of shared trails whenever possible is still advocated by many diverse national recreation organizations, and has worked successfully in many locations. Particularly in times of limited funding for trail construction and maintenance, widespread advocacy for the need for trails enhances the likelihood that they will exist, and be maintained to a usable standard. Conflicts typically occur when use levels reach a certain threshold at which point a decision may need to be made to segregate some of the different types of trail uses. See the response to Comment T5 for additional discussion.

**T22 Comment:** Private property owners that border public land should not benefit from public land without providing access to the public. Any private landowner that owns land that borders public land and does not provide public access to that public land should also be denied access to that public land under the principles of fairness and reciprocity.

**Response:** Routes on public lands that are not accessible to the public because of access restricted across private lands, or lands managed by other agencies will not be designated open on the South-

west Montana Interagency Visitor/Travel Maps when updated. This is one of the principles adopted by the RAC regarding motorized route designations on public lands, and has been accepted by the BLM. In this plan however, certain routes are shown open to motorized travel which may not be currently accessible across private or other lands because they have been identified as desirable routes for public motorized access should access become available. This is explained on page 58 of the Draft RMP/EIS in the second column in bold type.

**T23 Comment:** I support road closures by justifiable exceptions only. I oppose blanket road and trail closures whose only purpose is to prevent reasonable public access.

**Response:** Road and trail closures are not intended to prevent reasonable public access. They are intended to help achieve desirable road densities for wildlife, reduce the spread of weeds, provide reasonable opportunities for quiet recreation, and prevent the other kinds of resource damage more typically associated with roads, including erosion, stream sedimentation, damage to cultural resources, etc. The routes designated *open* to motorized travel are, in fact, intended to *provide* “reasonable public access.”

**T24 Comment:** MTVRA strongly recommends the BLM develop a true “No Action” alternative in compliance with NEPA and BLM planning regulations. The BLM must formulate a lawful “No Action” alternative so that the public and decision makers may reasonably compare and contrast other management alternatives. The “Preferred alternative option for travel management” cannot lawfully serve as the No Action alternative required under NEPA, because it is not an accurate baseline with which the public and the decision makers can objectively contrast and compare the proposed action and the other alternatives.”

**Response:** The “No Action” alternative in the Draft RMP/EIS is Alternative A. It is indeed an accurate baseline based on the Record of Decision issued in June 2003 for off-highway vehicle travel on BLM lands in the Montana, North Dakota and South Dakota. The “Preferred Alternative” in the Draft RMP/EIS is Alternative B. Alternative A provides the baseline with which the public and the decision makers can objectively contrast and compare the proposed action [Alternative B] and the other alternatives.

**T25 Comment:** Accurate route inventories as well as an understanding of the recreational use pattern are essential for effective travel management planning.



Each existing road and trail should be inventoried and evaluated on the ground to determine its recreational value and any significant problem areas that require mitigation measures. Each road and trail should be evaluated for its value as a motorized loop or connected route. Each spur road and trail should be evaluated for its value as a source of dispersed campsite, exploration opportunities, and scenic overlook destination or as access for any other reason.

**Response:** Route inventories were conducted during the summers of 2001 and 2002, and information from all other existing motorized route GIS coverages, including information extracted from 24K and 100K maps, the existing BLM facilities database, (including roads, known as FIMMS), and prior GPS inventory efforts was included in the database used in this planning effort. This database was also supplemented with digital orthophoto (satellite photo) imagery, and aerial photography information where necessary to resolve questions about existing route information. USFS databases were also consulted and Beaverhead and Madison Counties were involved in review of this information.

A subgroup of the BLM's Resource Advisory Council prepared the recommendations for designated motorized routes which became the basis for BLM's preferred alternative. The subgroup included a representative of Montana Trail Vehicle Riders Association and Capital Trail Vehicle Riders Association who acted as the chair of the subgroup. Consideration of motorized loops and connecting routes were a part of the discussions and negotiations that led to the subgroup's recommendations to the RAC and subsequently to the BLM. The subgroup also adopted some principles (which have been included in **Appendix I** of the Proposed RMP/Final EIS) that stated, "For motorized routes, loop routes are preferred to dead end routes" which guided much of the discussion about "spur road[s] and trail[s]" and when they were considered during the route designation process. Travel is still allowed to dispersed campsites within 300 feet of designated routes in accordance with the standard exceptions to off-road travel, also included in **Appendix I**. "Exploration opportunities, scenic overlook[s]," etc. were also discussed within the subgroup negotiations.

**T26** **Comment:** The BLM has never been proactive in providing the access and recreational routes needed by the public. Very few of BLM's recreational travel route inventory was "planned." The vast majority of routes used by recreationists were constructed for other purposes such as logging, mining or access to grazing allotments. Recreationists

must resort to creating valuable recreational experiences by themselves, with no guidance, input or assistance from land managers. OHV users, therefore, are unfairly criticized for the increase in "resource conflicts," and "proliferation of new, unplanned roads and trails." The situation is not reflective of "out of control" OHV users are as much as indicator of the unmet demand for recreational infrastructure. BLM should use valid recreational management principles, i.e. providing a variety of experiences, challenges, including loop trails, trails to breathtaking views, connecting existing routes etc. Consider proliferation of new, unplanned roads and trails as signs of the recreation staff not keeping up with demand. Think "recreational infrastructure and planning," not "travel management." Think in terms of providing recreational experience, not in terms of punishing the public for searching for such experience.

**Response:** Actually, recreationists must not "resort to creating valuable recreational experiences by themselves, with no guidance, input, or assistance from land managers." Recreationists are invited to participate with land managers in identifying opportunities, and even in development of those opportunities, assuming a decision is made to proceed in the suggested direction. Recreationists creating roads, trails, etc. to suit their own purposes are in violation of innumerable laws entrusting management of the public lands to the federal land managing agencies. We will consider the proliferation of new, unplanned roads and trails to be a violation of these laws. Finally, another large and vocal segment of the recreating public believes that there are far too many roads and trails open to motorized use. If the public endeavors autonomously to meet all of its own desires (not needs), none of the public will achieve the results they seek. BLM does use valid recreation management principles, including providing a variety of experiences and challenges within the Recreation Opportunity Spectrum. Included in the variety of recreation opportunities are some motorized and some non-motorized activities.

**T27** **Comment:** It seems as though the BLM is trying to change the recreation setting for the planning area to primarily non-motorized uses. MTVRA strongly encourages the BLM to reconsider any intent to do so. The proposed actions represent significant changes in recreation setting and are not consistent with multiple-use management of these lands. The BLM must adequately consider: 1) The tremendous popularity of vehicle-based recreation. 2) The BLM's failure to provide adequate managed trail systems designed for OHV use. 3) The BLM must recognize the significance of the BLM's

role in providing recreation in proximity to population centers, especially in Montana. The public relies heavily on access to their public lands to meet this recreation demand.

**Response:** BLM is not changing the recreation setting for the planning area. For the most part, BLM has described the *existing* recreation setting in most of the Special Recreation Management Areas, and made a commitment to try to maintain those conditions for future recreational use of these areas in similar ways. The majority of the planning area falls within the “Extensive Recreation Management Area,” which is by definition anything that is not within a “Special Recreation Management Area.” Although most of the SRMAs are designated to emphasize non-motorized recreation opportunities, approximately 735,000 acres of the roughly 900,000 acres (nearly 82%) within the planning area are within the Extensive Recreation Management Area, which might be characterized as “Roaded Natural” or “Semi-Primitive Motorized”. Failure to maintain areas where non-motorized recreation opportunities will be emphasized would be, as you suggest, “not consistent with multiple-use management of these lands.”

**T28 Comment:** Alternatives must prudently provide for increased OHV recreation opportunities to meet current and anticipated demand. The planning team should look to individuals and user groups for assistance in identifying opportunities for OHV recreation. The planning team should develop management alternatives that allow for proactive OHV management. All alternatives should include specific provisions to mark, map and maintain existing OHV opportunities. All alternatives should include instructions to engage in cooperative management with OHV groups and individuals.

**Response:** The South Pioneers SRMA is identified as an area to provide for additional motorized recreation opportunities (proactive OHV management). This area has been identified in part given input from local citizens participating in the Beaverhead Community Forum regarding the Pioneer Landscape Analysis. User groups and individuals will be involved in efforts to improve the motorized recreation opportunities in this area if they so choose to be. BLM also encourages the involvement of all interested groups or individuals in the cooperative management of public lands resources, including recreation.

**T29 Comment:** MTVRA recommends the following approach to the route designation process:

Adequate NEPA analysis includes inventory of all routes within the planning area, on the ground, regardless of origin of route. The inventory under-

goes NEPA analysis for disposition of the route-existing, designated, closed. This analysis is particularly important for records of decision where areas move from “open” to “limited to designated” or “limited to existing” roads and trails.

The disposition of the inventoried routes culminates in a map, installation of signs and information kiosks in the area, public notice of travel restrictions, information and education efforts, and enforcement of the travel restrictions. Signing will be prioritized based on enforcement needs. Some signs could indicate an open road, some could indicate a closed road including barriers such as signs, gates, logs, rocks, brush piles, or segments of fence. If there are areas found “most suitable” for OHV use, signs and maps could be used to “feature” or “highlight” these areas in order to encourage use in these appropriate areas. Educational signs and bulletins could likewise be used to discourage use in areas that have particular needs, especially seasonally.

Pursuant to a tiered OHV management plan (site specific planning), roads and trails would be analyzed to evaluate and identify opportunities for trail or road construction and/or improvement, or specific areas where intensive OHV use may be appropriate. Site-specific planning and inventory will be prioritized into High Priority areas, Moderate Priority, and Low Priority areas.

High Priority Areas are those area that currently have a high level of OHV use that has resulted in documented resource damage and/or resource user conflict (social conflict is not a consideration). Site-specific planning will be initiated within 2 years of the Record of Decision (ROD).

Moderate Priority Areas are those areas that have moderate OHV use. Site-specific planning will be initiated within 5 years of the ROD.

Low Priority Areas as those areas with minimal OHV use, with the exception of hunting seasons, and are somewhat remote. There are no specific requirements for initiation of site-specific planning for these areas.

**Response:** In accordance with BLM’s Land Use Planning Handbook dated 11/22/2000 (H-1601-1, **Appendix C**, Page 12) “All OHV designations, including road and trail designations or redesignations (see 43 CFR 8340.0-8 and 8342.2), must be made through the land use planning process described in 43 CFR 1600”. Subsequent guidance has encouraged route designations at the land use planning stage, but identifies those decisions as implementation level decisions that are appealable rather than protestable at the land use plan level. We are aware of the language in the comment taken from the BLM’s June 2003 Record of Decision for the Statewide OHV EIS. The OHV

EIS decision goes on to say, “**Travel planning and decisions can be accomplished** as an individual activity plan or completed **as part of a larger multi-program plan or large-scale integrated comprehensive landscape level plan.**” The Dillon Field Office elected to complete all travel planning within the Resource Management Plan rather than defer these decisions to a series of area-specific land use plan amendments in the future, and has notified the public of this since the year 2000. However, route designation decisions will be subject to appeal rather than protest once made.

**T30** **Comment:** The agency is strongly encouraged to work cooperatively with volunteer organizations on inventory of roads and trails, regardless of whether that inventory is done concurrent with planning or done on an interim basis prior to planning. Such cooperation includes education, workshops, and utilization of user-friendly global positioning software to covert data recorded by users with low-end GPS units to agency data needs, i.e. software such as OziExplorer. Adequate time must be allowed for volunteer organizations to work with the agency and may require several years.

**Response:** The BLM Dillon Field Office conducted an extensive inventory of existing routes on BLM lands during the summers of 2001 and 2002. The emphasis of this effort was to locate, and photograph the routes that most likely did not appear in any other road and trail coverage available to BLM. Inventory personnel were specifically instructed to map (with GPS) and photograph all routes, however faint, that they discovered in a systematic transect of BLM lands in the planning area. These routes were included in the overall road and trail database, and evaluated through the travel planning process to determine whether they should remain open to motorized use. In addition to the inventory, several “Information Fairs” were conducted to make all of the inventory and planning information available to the public and request any additional information the public might want to provide to supplement it. Travel management maps were provided for numerous public meetings, both BLM-hosted and publicly-hosted; comments have been solicited, received, and responded to; and adjustments have been made and information incorporated into the Proposed RMP/Final EIS. Once the RMP is approved, minor adjustments may be made to the travel management decisions through plan maintenance as provided for in the *Travel Management and OHV Use* section of the RMP. This direction is also consistent with the OHV EIS decision as described on page 7 of the June 2003 Record of Decision under “Maintaining and Amending Decisions.”

**T31** **Comment:** MTVRA requests that travel management alternatives be developed with the objective of including as many roads and trails as possible and addressing as many problems as possible by using all possible mitigation measures. Mitigation first, closure last.

**Response:** Alternative A (No Action) considers leaving all existing roads open to motorized use unless otherwise restricted by the 1996 Southwest Montana Interagency Visitor/Travel Map. Many other comments requested that significantly fewer routes be left open to motorized travel. The proposed plan represents what we believe is the most appropriate compromise to address the diverse interests of the public.

**T32** **Comment:** Proper education programs and service programs must be an important focus for plan revision. This emphasis should be a key part to avoiding social user conflicts by providing education to public lands visitors so they utilize the lands suitable for their mode of recreation. For instance, the plan should provide for service programs to educate pedestrian and equestrian users about the availability of designated National Parks that are relative free of motorized and mechanized activities.

**Response:** We are happy to refer pedestrian and equestrian users to the National Parks, but we are also mandated to provide for multiple uses of the BLM public lands. Non-motorized recreation uses are among the multiple uses the BLM is expected to provide for public land users.

**T33** **Comment:** The range of alternatives must address variations of motorized access opportunities. The roads and recreation component within each alternative should vary in the range of alternatives in correlation with other issues, such as habitat protection, commodity extraction. The overall emphasis of each particular alternative should be reflected in the roads program, travel plan, and recreation emphasis.

**Response:** In the Draft RMP/EIS, Alternative A represents the No Action Alternative, which includes allows motorized travel on all routes not otherwise restricted by the 1996 Southwest Montana Interagency Visitor/Travel Map. Alternative B, the Preferred Alternative is based on the recommendations of the BLM’s Resource Advisory Council, a group representing the diverse interests of the public. Alternative C contains further restrictions to motorized travel, primarily to address the most conservative approach to wildlife management needs. Alternative D considered more open routes than Alternative B to allow for additional access specifically for mineral exploration opportunities. The Proposed Action (Alternative B) in

the Proposed RMP/Final EIS, relative to the Draft Alternative B, is still based on the recommendations of the RAC, incorporates specific comments to open routes for motorized access for specific needs, closes certain routes for specific reasons, and includes additional areas closed to snowmobile use to preserve opportunities for quiet winter recreation and enhance winter wildlife security.

**T34** **Comment:** Agencies are encouraged to provide trailheads for popular trails.

**Response:** This will be considered on a site-specific level during implementation of the plan.

**T35** **Comment:** Motorized single-track recreation trails are limited at this time and continue to decline. The BLM does not always differentiate between ATV and motorcycle trails in their travel plans. Evaluations and travel plans should differentiate between ATV and motorcycle trails.

**Response:** This is certainly true within our planning area. Our motorized route inventory identified no established single-track motorcycle trails in this planning area. As described in the Affected Environment of the RMP on p. 226,

“Currently, OHV use in the Dillon Field Office is primarily associated with resource management activities and hunting. Although nearly 74 percent of the public lands in the planning area were identified as “open” to cross-country travel on the 1996 travel map, the majority of cross-country travel was not recreational OHV riding, but related rather to hunting and other multiple-use activities (e.g. – grazing administration, firewood gathering, etc.)”

Unlike more populated areas with concentrated recreational OHV use, single-track motorcycle trails have not been established on BLM lands in this planning area. We do not plan to develop single-track motorcycle routes within this planning area, but have identified one Special Recreation Management Area which would emphasize improving OHV riding opportunities in general in coordination with the Beaverhead-Deerlodge National Forest. Motorcycles and ATVs will be allowed to use routes identified open to motorized travel in this plan.

**T36** **Comment:** MTVRA is very concerned about the approach some land management agencies are taking when analyzing and disclosing effects to the human environment of OHV use. Suggestions: a)The BLM should avoid statements regarding vehicle use trampling vegetation and compressing soils, or a statements similar to: “driving a vehicle at wildlife will cause said wildlife to be disturbed” without also disclosing what, if any, the signifi-

cant impacts to the human environment for any of the proposed actions are. B)Impacts should be evaluated and disclosed in a fair and unbiased manner and with a relative sense of magnitude. Analysis of vehicle use should be compared and contrasted to baseline data in order to establish a threshold on which the significance of the impacts of the proposed actions can be determined. The absence of a rational connection between the facts found and the choice made has been defined by courts as arbitrary and capricious. C) Impacts should be described in sufficient detail for the public to fully understand the nexus between the impacts and the conclusions reached by the Deciding Officer. D) Analysis and disclosure of significant impacts or the proposed action must attempt to quantify any significant impacts and their relation to conclusions reached.

**Response:** Introductory information included at the beginning of Chapter 4 in both the Draft RMP/EIS and Proposed RMP/Final EIS provides the framework and describes the approach and assumptions used in this planning process to disclose impacts.

**T37** **Comment:** Wilderness Study Areas (WSA) are to be managed under the nonimpairment policy of the Interim Management Policy (H-8550-1). This policy states that only activities that do not cause surface disturbance and do not degrade the wilderness values are allowed in WSAs. Off-road vehicle use does cause surface disturbance and does degrade wilderness values even after the activity is terminated. ORV use degrades water quality, fragments wildlife habitat and damages riparian areas as ORVs are driven through streams.

**Response:** As stated under *Wilderness Study Areas* in the *Management Common to All Alternatives* section on page 68 of the Draft RMP/EIS, WSAs “...would continue to be managed according to the Interim Management Policy... until such time as Congress either designates them as wilderness or releases them from further consideration as wilderness.” The IMP says with regard to motor vehicle use, “Mechanical transport, including all motorized devices as well as trail and mountain bikes, may only be allowed on existing ways...” (page 16 of the IMP) It also says, regarding “existing facilities;”

*“Some lands under wilderness review may contain minor facilities that were found in the wilderness inventory process to be substantially unnoticeable. For example, these may include primitive vehicle routes (“ways”) and livestock developments. There is nothing in this IMP that requires such facilities to be removed or discontinued. On the contrary, they may be used and maintained as before, as long as this does not cause new im-*



*pacts that would impair the area's wilderness suitability.*" (p. 12)

You are correct that off-road vehicle use causes surface disturbance, and this is currently prohibited planning area-wide. Motorized wheeled vehicles are limited to designated routes within the entire planning area. The values you mention that are affected by motor vehicle use were considered in the route designation process.

**T38 Comment:** Centennials. In addition to the semi-primitive, non-motorized status, the BLM should also identify this area [Centennials] as "emphasize hiking." While we appreciate that Alternative C provides for the longest period of winter security through seasonal closures of routes, we ask that the BLM complete the job started in the Centennial Travel Plan and close the remaining route on the west end to all motorized use. Permittee or outfitter access could be given through a special use permit.

**Response:** The Centennial Mountains are used extensively by equestrian recreationists throughout the year. The presence of the Continental Divide National Scenic Trail (CDT) through the mountain range, and the limited trailhead access especially in the middle part of the range on the Montana side of the divide, make horseback use in this area especially important for the public recreational enjoyment of this area. The Centennial Travel Plan closed this area to virtually all motorized use (except on the periphery), and to mountain bike use to protect the primarily "primitive recreation" opportunities available in this area. Hiking is certainly welcome, but horseback use will remain welcome as well.

The "remaining route on the west end" will remain open to motorized use. It is a well-constructed, high standard gravel road that provides important access to hunting, firewood cutting, and other recreational opportunities including access to the CDT.

**T39 Comment:** In addition to keeping all WSAs as non-motorized during all seasons, the BLM should pay particular attention to those lands that abut, or are surrounded by, National Forest land. We ask that the BLM pay particular attention to these lands, as travel management here will drive travel management on Forest lands. As such, the BLM should concentrate identification of non-motorized activities on those parcels that already have a lower density of motorized routes, where closure of routes to motorized use would be more minimal and gains in non-motorized access could be maximized. It makes no sense to focus non-motorized activities outside of WSAs in areas with high road densities

and high levels of motorized use.

**Response:** Consideration was given to adjacent lands in making the specific adjustments to the travel management proposed in the Proposed RMP/Final EIS, and resulted in closure of additional areas to snowmobile use where such use was already extremely light. One section of BLM land was closed to snowmobile use because it was the only BLM land bordering National Forest lands also closed to snowmobile use.

**T40 Comment:** The BLM designates routes open regardless of whether access through non-BLM lands has been secured. We are concerned that showing open routes on the travel map without first securing access through private land may lead to confusion and conflict between the public and private landowners. A better way to avoid the confusion would be to close the routes where there is no legal access and open them at a later time once that access is secured.

**Response:** This is explained in the paragraph in bold type on page 58 of the Draft RMP/EIS in the *Travel Management and OHV Use* section

**T41 Comment:** We did not see in the draft any discussion of a commitment to monitoring and enforcing travel management. This is an especially important issue as the BLM is moving to a designated routes system. Violations of closures have been a very big problem in other areas where travel management has been done, for example, on the Caribou-Targhee NF just over the divide from the DFO. Please provide assurances in the final plan that the plan will be monitored for compliance and enforced by BLM personnel on a regular basis.

**Response:** We understand that there is a great deal that needs to be done to achieve compliance with the proposed travel designations. Of paramount importance are signing, education, and enforcement. Part of the recreation management emphasis of providing information and education would include the signing and education components. Although we also understand the importance of enforcement, we can not make that happen by writing it in a land use plan. We are aware of the limitations, and will strive to minimize them through a variety of means including; coordination with other agencies, working with local interest groups, pursuing any necessary legislative and regulatory changes, and enhancing our own law enforcement capabilities where possible. The changes necessary to become more effective in enforcing our travel management plan cannot really be accomplished simply by saying we will do a better job of it in our land use plan. Closed routes that continue to receive motorized traffic, and are causing resource

degradation would be highest priority for physical closure – either gating or obliteration.

- T42** **Comment:** Interest in a site that promotes motorized off-road recreation was also expressed as a mechanism to eliminate adverse economic impacts caused by road or trail closures in certain areas. This action would be consistent with County plans to promote and provide all types of travel and related recreation opportunities.

**Response:** An area near Argenta was considered by the travel management subgroup of the RAC for possible designation as “open” to cross-country vehicle travel, but was dropped from further consideration by unanimous decision of the Western Montana RAC. BLM agreed to this consensus recommendation. An area that includes the one proposed for an “open” designation has been identified as a SRMA to emphasize motorized recreation opportunities – but not to allow off-road travel. Little, if any, economic impact is anticipated from the closure of motorized routes in the planning area since major roads and most well-defined routes remain open.

- T43** **Comment:** However inadvertent, the lack of an inventory of non-motorized trails gives the public an inaccurate impression that the only way to have non-motorized trails is to close motorized trails. This is evidenced by the statistics cited in their comment letters.

**Response:** An overview of trails in the planning area, including non-motorized trails, is provided in Chapter 3 of the Draft RMP/EIS of the Draft RMP/EIS in the *Transportation and Facilities* section (pages 222, 224), in the section on *National Trails* (pages 235-236) and in the *Recreation* section (pages 219-220).

- T44** **Comment:** In reviewing the enclosed 1940 and 1962 Beaverhead National Forest (road) maps, the characterization that a significant portion of the roads being closed were made by users in the past 10 years. Similarly, the “red hen” data does not affirmatively demonstrate the need for all of these road closures as being needed, necessary and documented for resource protection.

**Response:** The first sentence is incomplete and difficult to respond to without a completed thought. No one has suggested that the “red hen” data affirmatively demonstrates the need for road closures. Routes not identified to be open to continued motorized use within this plan are the result of a lengthy process involving public participation, interdisciplinary resource considerations, further consideration of public comment on the draft, and finally some judgment regarding the desires of the

public balanced with resource issues. The photographic information collected as part of the route inventory efforts (“red hen data”) was only one of many tools used to allow the most careful consideration of these very important decisions.

- T45** **Comment:** The 1940 and 1962 Forest maps may be helpful in analyzing cumulative impacts of travel management over the years. There were two impact analysis questions surfaced at the Lima comment meeting. What is the impact of channeling 100% of the motorized use onto 60% of the remaining open roads? The other question was why should private landowners keep allowing public access across private land if the DFO finds it necessary to close 40% of their access?

**Response:** It is very misleading to suggest that current levels of motorized use have been “channeled” onto 60% of the available roads. The vast majority of the routes not designated open to continued motorized travel are not even accessible to the public due to access restrictions across private lands or lands managed by another agency. Other routes not designated open to continued public motorized use are extremely faint routes that were only included on the map because of our exhaustive effort to begin the route designation process with everything that might even remotely be considered a motorized route. So, the answer to the question is that the impact of “channeling” all this motorized use onto 60% of the remaining open roads is negligible. The routes identified to be open to motorized use have probably historically received over 99% of the public motorized travel.

Private landowners should consider allowing public access across private land because any routes not accessible to the public for motorized travel will be closed to *all* motorized travel, except where allowed under the exceptions in **Appendix I**. If private landowners hope to drive motorized vehicles on public lands adjacent to their property, they would have to allow the general public access across their lands to drive on those same routes on public lands.

- T46** **Comment:** The Commissioners recognize that multiple use does not mean that all uses must occur everywhere. There are a variety of mapped motorized use trails and a variety of mostly unmapped non-motorized use trails in the Dillon Field Office.

**Response:** The known, maintained, non-motorized trails do appear on the maps that were included in the Draft RMP. The narrative *Recreation* section of Chapter 3 describing the affected environment acknowledges that there are numerous other unmarked or unmaintained trails on BLM lands in

the planning area. These trails may be included on future maps when, or if, the BLM gains the capability to maintain them to a standard sufficient to justify calling public attention to them.

**T47** **Comment:** The Commissioners have some concerns about the quiet trails concept. Shared trails seem to be a public expression of values like multiculturalism, tolerance and integration. Quiet trails imply a paradigm of separate but equal and segregation. With that understanding, the Commissioners are aware of no legal basis for a policy like quiet trails and would request a citation as to its appropriate use in this NEPA process.

**Response:** There is considerable recreation research regarding the concept of “user conflicts.” Much of this research suggests that conflict is especially heightened between motorized and non-motorized recreation users, and that the presence of motorized use is significantly more disturbing to non-motorized users than is true of the reverse. (Motorized users are not particularly disturbed by the presence of non-motorized users.) Therefore, if the BLM is to attempt to provide a spectrum of recreation opportunities, some places must be identified for non-motorized use to allow this rather significant segment of the recreating public to enjoy their recreational pursuits. Because BLM is mandated by FLPMA to provide for multiple uses of the public lands, our legal basis stems from our authorizing legislation, and is reinforced by numerous supplemental regulations.

**T48** **Comment:** The Montana Tourism & Recreation Strategic Plan 2003-2007 has been available to your office online at: <http://travelmontana.state.mt.us/newsandupdates/strategic.htm>

The Draft EIS is unclear as to how closure of up to 47% of the DFO’s 2,102 miles of roads to motorized access is a coordinated, proactive approach to management consistent with Montana’s 2003-2007 Travel Montana Strategic Plan.

**Response:** Only looking at the percentage of routes open or closed is addressed elsewhere (see the response to Comment T45). We have reviewed the Montana Tourism and Recreation Strategic Plan 2003-2007 and see no goals or objectives inconsistent with the Dillon RMP. In fact, the approach used to engage citizens representing both motorized and non-motorized interests to address route designations through a subgroup of the Western Montana RAC is quite consistent with actions listed in the section on *Managing the Use of Assets* in Chapter 5 of the cited Strategic Plan. Among the items identified in the Strategic Plan’s Vision is “Balance.” The discussion of balance even describes the importance of the diversity of recre-

ation experiences. If the entire planning area is open to motorized use, it would not appear to offer diverse recreational experiences or “balance.” The Strategic Plan also identifies in its “Guiding Principles” the need to “Respect diverse needs, perspectives and concerns...” Much of the travel management portion of this final plan is a direct response to the various and diverse needs, perspectives and concerns identified in response to our draft plan. The concerns expressed, and addressed in this final plan, were representative of both motorized and non-motorized recreational interests. Tourists choosing to visit Montana frequently cite the natural beauty of the state as their reason for visiting. They seldom identify the availability of open motorized routes as a primary reason for visiting.

**T49** **Comment:** EPA believes reductions in road density, improvements in road drainage, and reductions in sediment delivery from roads are important components for improving aquatic health in project area streams. The RMP indicates an estimated 668 miles of transportation system roads in the FIMMS database and many more miles of non system roads in the Dillon Field Office area (page 222). We support the proposed cap on total road mileage in the planning area (page 59), and even suggest that reductions in road mileage and road density in the planning area be considered to improve aquatic health in project area streams, as well as to protect wildlife.

**Response:** Open road density has been slightly reduced as a result of route designations in the proposed action, and total road mileage will be capped as described in the *Travel Management and OHV Use* section of Chapter 2.

**T50** **Comment:** We are concerned about increasing use of off highway vehicles (OHVs) and all terrain vehicles (ATVs) that occurs away from roads and trails, including steep slopes, wet meadows, and around water bodies. We are concerned that OHV/ATV activity is causing erosion and habitat damage and adversely impacting wildlife habitat and security. Executive Order 11644, “Use of Off Road Vehicles on Public Lands,” requires agencies to ensure that the use of off road vehicles on public lands will be controlled and directed so as to protect the resources of those lands, to promote the safety of all users of those lands, and to minimize conflicts among the various uses of those lands. We believe recreational uses should be directed and encouraged toward more resilient areas where they would cause the least environmental harm.

We support the proposals to limit wheeled mo-

torized vehicle travel to designated routes throughout the planning area (page 59). Management direction should include appropriate limitations and restrictions on motorized vehicle use to protect against erosion, transport of sediment to streams, spread of noxious weeds, and degradation of aquatic habitat by motorized vehicle use in wetlands and other environmentally sensitive areas. We also encourage the BLM to include management direction that ensures that motorized access within 300 feet of designated routes to access dispersed campsites does not damage ecologically sensitive resources such as streams, wetlands or areas with rare or sensitive plants. We also believe user created, non system trails roads, which are most likely completely unmaintained, should be removed from the designated road system and posted as closed to motorized travel.

**Response:** All OHV activity is limited to designated routes in accordance with the direction provided in this plan. The majority of the motorized routes on BLM lands in this planning area are unmaintained two-track roads (what the commenter refers to as “user created, non system trails”). To remove all of these routes from the system of routes designated for motorized use would severely restrict the public’s ability to continue to access public lands in this area. Through our route designation process, we made every effort to eliminate routes from continued motorized travel that were considered likely to be the source of erosion or other resource concerns.

**T51** **Comment:** It does not appear as though handicap access was ever considered.

**Response:** Motorized access for disabled recreationists is discussed on page 58 of the Draft RMP/EIS under “Management Common to All Action Alternatives.” It continues to be provided for in the Proposed RMP/Final EIS.

**T52** **Comment:** If roads are to be closed, they are to be closed to EVERYONE, not just the public. BLM, USFS, and State DNRC have caused much damage themselves through patrolling and monitoring on ATVs, 4x4s going cross country.

**Response:** Employees of the BLM Dillon Field Office are encouraged to minimize their use of vehicles in any areas closed to public motorized vehicle use in accordance with direction issued by the Montana/Dakotas State Director after release of the Statewide OHV EIS. However, there are instances when use of motorized vehicles is clearly the most appropriate method, sometimes the only method, to effectively manage the resources on the public lands. These allowances are also made for other users of the public lands where conditional

use is warranted. Exceptions to the Off-Highway Vehicle Travel restrictions are included in **Appendix I**.

**T53** **Comment:** Closure of certain roads will discontinue the routes from Point A to Point B. In closing these roads, the traveler will have to backtrack and then take a longer route around to Point B. This may mean that just continuing the road for about 100 yards or so as opposed to having to travel the longer route of perhaps 50 miles. In light of the energy crisis more fuel would be used not to mention the inconvenience and pure common sense of the issue at hand.

**Response:** The principles established by the subgroup included emphasizing loop routes wherever possible rather than spur routes. This was done as much as possible.

**T54** **Comment:** The BLM has said they have an accurate inventory of roads/trails. There were several roads described by attendees at a meeting held at the Search and Rescue building, after the BLM meeting, that were not on the maps generated from BLM inventories.

**Response:** We have encouraged the public to provide us with information to perfect our route inventory throughout the entire planning process, but especially at Information Fairs held in April 2002, at the Focus Question Workshops convened in February 2003, and at the public meetings sponsored by BLM in May 2004 after the Draft RMP/EIS was released. We believe we have completed as comprehensive an inventory as possible under the circumstances, and in consideration of the time and other constraints. We also acknowledge that it is possible – even likely – that it is not absolutely complete and perfect. The *Travel Management and OHV Use* section in Chapter 2 describes this understanding, and our intent as to how we will deal with routes that have been inadvertently missed.

**T55** **Comment:** The document and decision must clearly disclose on maps and table and summaries all existing areas, and existing roads and trails that would be closed to motorized access and motorized recreationists.

**Response:** The section on *Travel Management and OHV Use* provides the comparisons by alternative of both acres of the planning area and miles of route open, limited or closed. The corresponding section of Table 12 summarizes the comparison of alternatives. Eight oversized maps (Maps 44, 45, 47-52) show which routes would be designated open to public motorized vehicle travel across the four different alternatives, either yearlong or seasonally. Those routes not identified as open are closed.



Please also see the map identifying areas closed to snowmobile use (Map 46). We have added a separate map to the Proposed RMP/EIS (Map 85) to more clearly display areas that would be considered closed under 43 CFR 8342.1 to complement the narrative list included in the *Travel Management and OHV Use* section of the Proposed RMP/Final EIS.

**T56** **Comment:** The evaluation and decision-making must also take into account that the total area of BLM managed lands in the project area equals about 900,000 acres and out of that total about 50,000 acres or 6% is designated wilderness and the remaining 850,000 acres or 94% are intended for multiple-uses and every multiple-use acres must remain available for multiple uses.

**Response:** These things have been taken into consideration, and are identified in the document. The planning criteria listed on pages 9 and 10 of the document describe the intent to apply multiple use and sustained yield principles in the RMP. The alternatives presented in the RMP identify four different multiple use scenarios for management of BLM-administered lands in the planning area. However, multiple use does not mean that every use must be allowed on every acre of land. For clarification, only approximately 6,000 acres of land administered by the BLM and addressed in this planning effort is designated wilderness. An additional 122,000 acres is managed under the Interim Management Policy for Lands under Wilderness Review given their Wilderness Study Area status. All of these lands are available for multiple-use. Some of them do not allow motorized use, but all of them allow hunting, camping, hiking, backpacking, nature photography, wildlife viewing, and a variety of other recreation uses, scientific uses, etc. In addition, many of these areas allow livestock grazing, some motorized vehicle use, and other more varied types of multiple use. BLM is not mandated to provide for every possible use on every possible acre, but a variety of uses as appropriate across the landscape.

**T57** **Comment:** Motorized visitors are continually losing significant recreational opportunities by conversion of multiple-use areas to non-motorized areas. We are greatly concerned about the cumulative negative impact associated with the reduction of multiple-use and OHV recreation opportunities because it is significant. We do not expect to have the freedom to go anywhere and do anything that we want. However, we are losing the basic opportunity to travel to places and experience outdoor recreation that we have enjoyed for decades.

**Response:** Non-motorized users have expressed a similar concern over the cumulative loss of non-motorized opportunities over time due to the increased numbers of motorized users, increased performance capabilities of motorized vehicles, growing populations, lack of compliance or enforcement of existing motorized vehicle restrictions, etc. As discussed elsewhere, the decision regarding travel management in this plan constitutes our best effort to satisfy a public with widely divergent recreational interests.

**T58** **Comment:** Forest Service and BLM law enforcement has taken the position that OHVs cannot legally ride on forest or BLM roads unless the road is designated dual-use. Cumulative decisions have closed OHV trails to the point that there is not an interconnecting network of routes. At the same time, the agencies have not designated a functional network of dual-use routes to interconnect to OHV routes. Therefore, these closure decisions are forcing the OHV recreationists to ride non-designated dual-use routes illegally. The proposed action must include these designations in order to provide a network of OHV routes with interconnections, where required, using dual-use roads in order to be functional. This will allow OHV enthusiasts to operate legally on Forest and BLM roads. We request that a system of dual-purpose roads, and OHV roads and trails that interconnect be one of the primary objectives of the travel management plan and that this objective be adequately addressed in the document and decision.

**Response:** Forest Service and BLM law enforcement have become more diligent in enforcing a State law that requires vehicles operated on Montana public “highways” to be legally registered, and therefore “street legal.” According to Montana State Law (61-1-201, “‘Highway’ means the entire width between the boundary lines of every publicly maintained way when any part thereof is open to the use of the public for purposes of vehicular travel...” Since BLM has designated numerous routes open to motorized vehicle use that are not “publicly maintained,” and are simply established, traveled routes, there are numerous routes on BLM lands where this law does not apply. Maintained roads crossing BLM lands are normally primary access routes to other lands, and therefore provide the connected system of dual-purpose roads. The maps within this plan are not intended to replace the Southwest Montana Interagency Travel Plan. Identification of these “dual-purpose” primary access routes across public lands should be accomplished through the coordinated effort of all the agencies when updating the Southwest Montana Interagency Visitor/Travel Map.

**T59 Comment:** Our observations of recreationists visiting the primitive roads and trails within public lands indicate that over 95% of the visitors represented multiple uses that rely on motorized access and/or mechanized recreation (data available upon request).

**Response:** Virtually all recreationists rely on motorized access to outdoor recreation opportunities. Many of them hope to leave the motorized vehicles behind to enjoy the type of outdoor recreation experience they seek.

**T60 Comment:** The WSAs represent a small portion of the Bureau's land base in the region. Our members are greatly concerned about the explosive growth and associated impacts of motorized use on our public lands in southwest Montana. **It is our position that all of the WSAs should be "managed as wilderness", and remain completely motor free.** The agency's Interim Management Plan mandates that WSAs be managed so their suitability for inclusion into the Wilderness Preservation System is not jeopardized, and that their wild qualities are maintained and enhanced.

The list of resource damage and user conflict that snowmachines, ATVs and motorbikes create is long and well documented by the US Forest Service. Illegal trespass on to private lands, pervasive spread of noxious weeds, trail damage, wildlife harassment, and a total loss of opportunities for quiet and solitude are just a few of the problems associated with motorized recreation. Traditional recreationists, walkers and horse packers, believe that protecting the few scraps of land represented by the BLM WSAs would be an meaningful step in providing something for quiet trail users, wildlife, and sensitive plant habitats.

**Response:** Section 603 of FLPMA makes it clear that Congress did not intend for the BLM to manage WSAs as if they were already designated wilderness, but rather to ensure that the wilderness conditions present at the time of the inventory were not degraded until such time as Congress had the opportunity to designate those areas *they* determined were appropriate for inclusion in the National Wilderness Preservation System. If a use (including motorized vehicle travel) was occurring at the time of the wilderness inventory, and the area still appeared to have wilderness character, it is presumed that that use could continue to occur during interim management without impairing the wilderness character. If impacts from use change significantly enough to begin to impair wilderness qualities, BLM has the authority under existing regulations to close that area to the kind of use that is causing the impairment. If the BLM were to "manage as wilderness" all of its WSAs, it would

be usurping Congress' authority to make the final determination as to whether those lands qualified to be designated wilderness.

**T61 Comment:** The DRMP proposes to finally sign/ implement the 2001 OHV amendment as the Forest Service did three years ago. The DRMP/EIS failed to develop and consider a reasonable alternative prohibiting OHV travel off of BLM open road systems.

**Response:** The BLM signed the Record of Decision for the OHV EIS in June of 2003, prior to release of the Draft RMP/EIS. All descriptions in the Draft RMP/EIS include the restriction of wheeled motorized vehicles to existing roads as the baseline in accordance with that decision. See the *Travel Management and OHV Use* sections on page 225 of Chapter 3 or pages 58-59 of Chapter 2 of the Draft RMP/EIS.

**T62 Comment:** The DEIS states that existing routes will be "identified for closure and/or rehabilitation (as necessary) where wildlife displacement, habitat fragmentation, or other issues are identified and the "new road" would provide better access and/or fewer conflicts" (p.59). Does this mean that no existing routes will be closed or obliterated as part of the travel management analysis? Why was this management option not pursued?

**Response:** It does not mean that no existing routes will be closed or obliterated as part of travel management, but that would certainly be an exception rather than the rule. Routes not identified as open to public motorized travel are still considered valuable for emergency purposes including fire suppression and search and rescue operations. They may also be valuable for continued use for administrative use or permitted activities such as livestock management activities which are exempted from cross-country OHV restrictions. Route obliteration could be considered as a travel management tool, but would only be used as a last resort to respond to continued compliance problems and associated resource conflicts or damage. In addition to the potential usefulness of closed routes, obliteration as standard management practice would be cost prohibitive.

**T63 Comment:** Very little of the planning area will be closed to OHV or snowmobile use under the preferred alternative. There is no difference in the number of acres opened and closed to OHV use in all of the action alternatives. Why is there no range of alternatives for this issue?

**Response:** Technically, there were no lands identified as "open" to OHV use under the definitions provided in 43 CFR 8342.1, which require OHV

designations to be made during the planning process. An “open” designation would allow cross-country motorized travel, which this plan would not under any alternative, consistent with the recommendations of the Western Montana RAC. There was however an error in the acreage figures identifying “limited” and “closed” OHV designations in the draft. Under Alternative C, all WSAs were closed to snowmobile use yearlong. Because some of those WSAs also had no designated motorized routes in that alternative, the acreage for “closed” areas should have indicated 93,245 acres were “closed” in Alternative C. This has been adjusted in the Proposed RMP/EIS. The proposed action (Alternative B) in the Proposed RMP/Final EIS includes 74,350 acres identified as closed to OHVs as defined in 43 CFR 8342.1 based on changes made due to public comment on the Draft RMP/EIS.

**T64 Comment:** In the environmental consequences section, the DEIS states that impacts under Alternative B would be the same as under Alternative A except for the Tobacco Root Tack-on. There are travel management differences between the alternatives; some roads are closed in WSAs that are currently open under Alternative A. We would like to see a detailed analysis of how these WSAs are currently meeting the intent of their designation and how the various alternatives measure up against that intent. If there is not much difference between the alternatives, this indicates that there is not a broad range of alternative management proposed in the DEIS. It would be helpful, for example, to have an alternative that does not allow motorized use in the WSAs and to assess the implications of that management action.

**Response:** One alternative (Alternative C) considered closure of all WSAs to snowmobile use. As explained elsewhere, motorized use within WSAs is consistent with management of these areas according to the IMP.

**T65 Comment:** Numerous comments identified the need for routes to be designated open because they provided access for private land owners, or for ranchers to administer their permits (i.e., fence maintenance, salt and mineral supplement access, water developments, stock management, etc.).

**Response:** Among those exceptions identified in **Appendix I** is one that allows “Motorized cross-country travel by lessees and permittees performing administrative functions on public lands within the scope of a permit or lease.” This includes, among other things, ranchers administering their permits.

Although it was not stated specifically in the

*Travel Management and OHV Use* section, private landowner access was addressed in the *Lands and Realty* section (page 40 of the Draft RMP/EIS) where it says, “Owners of non-Federal land surrounded by public land managed under FLPMA would be allowed a degree of access across public land which would provide for the reasonable use and enjoyment of the non-Federal land.”

A paragraph has been added to the *Travel Management and OHV Use* section in Chapter 2 to more clearly and specifically address the concern over access to private lands. It reads,

*Routes on public lands that are not accessible to the general public (across private or other lands) would be closed to all recreational motorized wheeled vehicle travel except as provided in Appendix I (Off-Highway Vehicle Travel Exceptions and Allowances). Where no reasonable alternatives exist, access to private land using routes crossing public lands that are not designated open to public motorized use would be allowed to the degree necessary to provide for reasonable use and enjoyment of that property.*

The exceptions and allowances in **Appendix I** have also been adjusted.

**T66 Comment:** The BLM already has the solution to the snowmobile problem in the draft Environmental Impact Statement, though it is in Alternative C, not the preferred alternative. The proposal that all Wilderness Study Areas be snowmobile free must be chosen so that the Record of Decision will be consistent with the agency’s own Interim Management Plan (IMP). The IMP states that management of Wilderness Study Areas must not impair their suitability for preservation as wilderness until such time as Congress either designates them as wilderness or releases them from further study.

Continuing to allow snowmobile traffic in the Wilderness Study Areas does create user conflict with management: The wilderness values of the Wilderness Study Areas must be maintained and enhanced. Snowmobile use also conflicts with the preservation of wilderness values at a later time by creating the perceived right to drive snow machines into Wilderness Study Areas and by causing surface disturbance and spreading noxious weeds. Some might argue that snowmobiles do not create surface damage, but the newer machines are able to drive over large areas of exposed soil. This does create surface damage, particularly because snowmobiles are currently allowed to travel cross-country and not stay on designated trails.

Snowmobiles of today are far more powerful and can travel further and on rougher terrain than ever before imagined. Therefore today’s machines are essentially a new use, but even if viewed as an

existing use, the machines of today can travel in deep snow and up significant inclines as never before, the BLM must consider how the use will create conflicts with other management objectives and preservation of wilderness values in the future. Please see enclosed articles on the newer snowmobiles.

The Montana Wilderness Association urges BLM decision makers to do the right thing and close all 10 Wilderness Study Areas to snowmobiles. While they would be closed to snowmobiles, The 10 Wilderness Study Areas would then be open to quiet trails users and would be preserved for Wilderness designation if Congress decides.

**Response:** As you say, “The IMP states that management of Wilderness Study Areas must not impair their suitability for preservation as wilderness until such time as Congress either designates them as wilderness or releases them from further study.” The IMP also devotes a page to describing “Management to the Nonimpairment Standard.” The first two lines of that page say,

*“Management to the nonimpairment standard does not mean that the lands will be managed as though they had already been designated as wilderness. For example, some uses that could not take place in a designated wilderness area may be permitted under the IMP because they are only temporary uses that do not create surface disturbance or involve permanent placement of structures.”*

Clearly, snowmobile use is a temporary use that does not create surface disturbance or involve the permanent placement of structures. Although there is some possibility that exposed soils would be disturbed by passing snowmobiles, it is unlikely to significantly impair the wilderness character of the lands to the point that Congress would be constrained in its consideration of whether the area was suitable for designation as wilderness. If such a situation arose, BLM has existing authority to close such an area to any activity degrading the resources.

The first line of the next page of the IMP entitled “General Policy” begins with, “The BLM’s management policy is to continue resource uses [emphasis added] on lands under wilderness review in a manner that maintains the area’s suitability for preservation as wilderness.” It was clearly not Congress’ intent that the BLM should administratively designate and manage wilderness – only that we would identify lands that were suitable for consideration as wilderness and manage them in a way that would retain those qualities until such time as they had an opportunity to arrive at their own decision. (Who would have ever known it would take them thirty years to make a decision?)

Alternative B has been adjusted in the Pro-

posed RMP/Final EIS to closes over 27,000 acres of additional lands to snowmobile use to provide additional opportunities for non-motorized winter recreation and provide for additional winter wildlife security. Some of those lands are within WSAs, and some are not.

**T67**

**Comment:** The Interim Management Plan mandates that wilderness values must be maintained and enhanced. Naturalness is a specific value named in the Interim Management Plan. Because the roar of snowmobiles can be broadcast across the landscape for miles, the noise directly degrades the naturalness of the Wilderness Study Areas.

**Response:** BLM’s legal mandate regarding management of WSAs comes directly from Section 603 (c) of FLPMA, which requires that they be managed “in a manner so as not to impair the suitability of such areas for preservation as wilderness...” The “nonimpairment standard” described in a related comment is the resultant guidance from that mandate that is described in the IMP. The IMP does not require that wilderness values be *enhanced* overall. Although there is some discussion of “enhancing wilderness values” in the IMP (especially pages 10-11), it is in the context of a larger discussion regarding what proposed activities might be allowed that might, at first flush, appear to be impairing to existing wilderness values. The intent of this discussion is to provide for an overall evaluation of a proposed project – usually one involving the permanent placement of a structure – that permits an objective assessment of the impacts that on balance protects the existing wilderness character. The IMP does not suggest any obligation by the BLM to provide for management that enhances the overall wilderness characteristics of the WSAs. Though this may be a worthy goal, it is not established by regulation or policy.

**T68**

**Comment:** Please explain why off road motorized recreation is considered an appropriate use of public lands. This type of recreation is a management headache and a threat to resources, just an added burden and expense for land managers. And relative to the total number of public land users, the numbers of motorized users are small.

**Response:** Motorized recreation is considered a valid use of public lands under the FLPMA mandate of multiple use. The Draft RMP/EIS does not allow for off-road motorized vehicle use on BLM-managed public lands for recreation purposes.

**T69**

**Comment:** The starting alternative proposed to eliminate motorized access and motorized recreational opportunities without first adequately addressing the needs of the public for motorized ac-



cess and motorized recreation and without proper evaluation of facts and information. This procedure is evidence of significant predisposition in the process.

**Response:** We are uncertain what this comment means regarding the “starting alternative”. The Draft RMP/EIS contained four alternatives, including a No Action Alternative (Alternative A) and a Preferred Alternative (Alternative B). None of the alternatives eliminate motorized access and motorized recreational opportunities. See response to Comment T33 for additional discussion.

**T70 Comment:** I’m against any more road closures. The BLM and the Montana Department of Fish, Wildlife and Parks should get together and work on a plan for good overall management, both for the land (which is what the BLM is supposed to manage) and the wildlife which is what Fish, Wildlife and Parks is in charge of.

**Response:** A representative from Fish, Wildlife and Parks served as one of the members of the subgroup convened by the Western Montana RAC that developed the proposed route designations included in the Preferred Alternative (Alternative B) of the Draft RMP/EIS.

**T71 Comment:** What I would like to see the BLM do is start over. Make their proposal on a smaller scale. Give the public a viable reason as to why they’re closing each and every road.

**Response:** BLM has given the public unprecedented opportunities to become informed and be involved in the land use planning process. Beginning with a public participation assessment conducted in March 2000, the public has been informed of BLM’s intent to develop a Resource Management Plan and include in that plan travel management decisions for the 900,000-acres planning area. We believe the principles established by the subgroup of the Western Montana Resource Advisory Council, information collected during the route inventory conducted at the beginning of the process, and consideration of the public comment submitted on the Draft RMP/EIS regarding specific routes provide adequate rationale for the route decisions presented in Proposed RMP/Final EIS. We do not believe the level of effort expended in assuring public involvement opportunities and the data available for consideration warrants “starting over”.

**T72 Comment:** Motorized recreationists are being required to identify and inventory all of the routes important to them and those that should remain open for motorized access and motorized recreational opportunities. This procedure puts an unreasonable burden on motorized recreationists and

demonstrates a significant prejudice in the process that must be corrected. Inventories and expressions of interest and need for all other groups and resources are accounted for by the agency as part of the process.

**Response:** BLM did not require motorized recreationists to provide an inventory of routes. BLM conducted additional inventory to supplement the available various data sets in an attempt to document all existing routes across BLM lands. Information provided on page 226 of the Draft RMP/EIS explained this process. This information was available at the Information Fairs held in April 2002 for public review. The public was invited at that time and throughout the process to identify errors, omissions or corrections and to submit better information to increase the accuracy of the inventory.

**T73 Comment:** The Travel Plan on Dillon BLM lands should be coordinated with the travel plans in adjoining national forests. This has not taken place.

**Response:** As partners in developing the Southwest Montana Interagency Travel Plan and Map, the BLM and Forest Service coordinate closely on travel management. In addition, representatives from the Beaverhead-Deerlodge Forest were briefed on BLM’s proposed inventory of routes at the initiation of this planning process and invited to participate. After the Western Montana RAC subgroup recommendations were received, maps were provided to each of the Ranger Districts within the planning area for review, and the respective districts returned marked maps to the BLM with changes that would provide consistency with Forest management.

**T74 Comment:** The maps do not have adequate detail or scale required to disclose the true extent of the proposed closures to the public. They should have main roads on them and should be error checked. The maps should be identical to the Southwest Montana Interagency Travel Map as people are familiar with these maps. BLM did not even mention the recreation maps, old and new series, as well as the Interagency maps. Those are the best maps to identify access problems supplemented by USGS quads and photo quads. It appears BLM tried to create their own small-scale maps using inaccurate information. Changing the scale, eliminating the non-BLM roads, not showing towns, streams, mountain ranges, section lines, etc. makes the maps almost impossible for the general public to understand, much less provide meaningful comments on the alternatives displayed on these maps. BLM should have considered providing a clear overlay to show “background” data such as streams, moun-

tain ranges, etc. to help people orient themselves. On the travel maps, the “open year round” solid line looks like the “paved road” solid line and is confusing. A different symbol should be used for either “routes restricted between April 1 and July 1” or the “4-wheel drive trail” so it is easier to differentiate between the two.

**Response:** We believe the maps provided in the Draft RMP are at a sufficient scale to display the types of decisions being made at the land use plan level. The information used to create the maps was the best inventory information available to BLM, merged from several sources. Maps depicting routes designated for motorized travel by alternative were oversized and full color to assist the public in orienting themselves, and included town locations, major roads, and township and range identifiers. Adjustments have been made to certain symbols/colors on the maps included the Proposed RMP/Final EIS.

These maps are for planning purposes and are not intended to be used in the same fashion as the Southwest Montana Interagency Travel Plan Map. This is noted in the *Travel Management and OHV Use* section in Chapter 2. In fact, these maps should NOT be used as “travel” maps even after the plan is approved, since designated routes where access does not currently exist would not be available for public use until public access exists. The “Recreation” series maps are no longer distributed by BLM as official maps; the Southwest Montana Interagency Travel Map will continue to be the map distributed by the BLM Dillon Field Office and updated in conjunction with all of the partners in this effort.

**T75 Comment:** There needs to either a map or separate maps displaying the motorized and the non-motorized roads/trails. To show only the motorized trails/roads creates an inaccurate perception in the mind of the public that there are no non-motorized trails because none are displayed. If there are no inventories of the motorized and non-motorized trails or they are incomplete or inadequate, this is something to disclose in the Draft EIS and to be inventoried early in the life of the plan.

**Response:** The oversized travel maps provided in the Draft RMP/EIS display all the routes currently entered in the Dillon Field Office inventory base. Routes that are not designated for motorized use are available for non-motorized use. As with all resources, data collection and inventory is ongoing. We have clarified language in the *Travel Management and OHV Use* section as to how information would be updated over the life of the plan.

**T76 Comment:** The maps provided to Beaverhead and Madison Counties used two colors, blue and yellow, to distinguish what current management is and would be closed in the Preferred Alternative “B.” Blue showed the roads/trails currently open and yellow delineated the roads that would be closed under the preferred alternative. Additional colors could have been used to differentiate between the following and provide useful information on which to base comments:

- Roads/trails that will be currently “open” under Alternative A.
- Roads/trails that will be “closed” as a management action under Alternative B.
- Roads/trails that will be “open” as a management action under Alternative B.
- Roads/trails that will be “open” as a management action under Alternative B, but have no legal access. These might be priorities for easement acquisitions.

**Response:** The maps referred to in the comment were prepared on short notice after release of the Draft RMP/EIS according to the request received from the Commissioners even though oversized maps were included in the Draft RMP/EIS for comparison of each alternative. They were highlighted as requested by the Commissioners.

**T77 Comment:** The road/trails inventory should be accessible to the public and usable for monitoring. The DFO’s “red hen” data set for the creation of the travel maps and is an excellent starting point. The “red hen” data set of motorized use trails represents a baseline inventory and the basis of a monitoring system.

**Response:** Inventory information on existing routes in the BLM database was available for public review at the Information Fair held in April 2002 to set the stage for the RMP travel planning effort. The availability of this information to the public is limited only by the capabilities of user hardware and software to use the data. Language in the *Travel Management and OHV Use* section has been clarified regarding data corrections and use as a baseline.

**T78 Comment:** We do not support the preferred Alternative B which allows snowmobile use on 91% of the 900,000-acres resource area. Please address the impacts of snowmobile use on wildlife species and non-motorized users.

**Response:** We have provided additional discussion of the impacts of snowmobile use on wildlife and recreation users pertinent to BLM lands in the *Wildlife and Recreation* sections of Chapter 4. See the response to Comment T6, T60 and T66 for further discussion.

**T79** **Comment:** If the loss of motorized routes cannot be mitigated within the project area, then a Motorized Access and Recreation Mitigation Bank must be established. This mitigation bank would keep an overall accounting of the miles and acres of motorized access and recreational opportunities closed and the new motorized access and recreational opportunities created to offset that loss. It would be the responsibility of a cooperative group of public land management agencies to monitor the balance sheet and work towards no net loss/closure of motorized access and motorized recreation.

**Response:** There is considerable disagreement among the various public interest groups and individuals over how much motorized use is appropriate. If we were to consider the extent of “loss of motorized routes” over a period of time, what point in time would be considered appropriate as a baseline? Many non-motorized recreation advocates suggest that the numerous vehicle routes that have been created over the last ten to thirty years should not be considered “legitimate” motorized routes. We have made an attempt at creating a balanced approach to travel management in this area, and will manage future uses to maintain approximately the same level of routes designated open to motorized use over the life of this plan.

**T80** **Comment:** We all support grazing on public land and agriculture in general. However, much of this is heavily subsidized by the public. This is why agriculture is the number one industry in Montana (because it is subsidized far more than any other industry). Forest products and mining is mentioned, however recreation and tourism receives only a few lines, yet recreation and tourism is undoubtedly the number one industry in Montana by far. I have a document from the Forest Service that indicates recreation far surpasses any other use of our forest lands. This is quite likely to be the exact figure for our BLM public lands. After a couple of phone calls, BLM has been unable to supply any documentation where once can compare one multiple use with another.

**Response:** Pages 219-220 of the *Recreation* section and pages 250-252 of the *Economics* section in the Draft RMP/EIS contain information on the recreation program, visitor use days, and an overview of travel, tourism, and recreation as a key industry in the planning area. In our prior contacts with the commenter, BLM was faxed statements made by the Assistant Secretary of Agriculture in 1996, referring to Forest Service lands on a national scale. The information in our RMP is focused on Beaverhead and Madison Counties and

certainly acknowledges the major contribution that recreation makes in the Dillon area.

**T81** **Comment:** I have never witnessed BLM conducting weed abatement on these roads, enforcing laws applying to these roads, and conducting any improvements whatsoever. Leaving roads open can only have positive impacts on the economy and the ability to use and recreate on public lands.

**Response:** The BLM Dillon Field Office manages one of the most aggressive weed control programs in Montana in cooperation with Madison and Beaverhead Counties. Most of the weed control efforts are focused on the many miles of roads where the establishment of weed infestations is most prevalent. The Dillon Field Office also has one full-time Law Enforcement Officer who routinely patrols the nearly one million acres of BLM lands in the planning area enforcing, among many other regulations, those that apply to public roads on BLM lands. BLM also performs numerous road improvement projects every year as funding allows. Finally, BLM is leaving roads open to provide access for public land recreation, and closing certain routes for resource protection, wildlife security, and providing opportunities for non-motorized recreation. Creating a diverse array of recreation opportunities benefits the economy by providing opportunities for a broader spectrum of the public.

## RIPARIAN AND WETLAND VEGETATION

**U1** **Comment:** The plan places too much emphasis on habitat.

**Response:** BLM is responsible for habitat management on lands it administers.

**U2** **Comment:** Alternative C forbids livestock grazing on Centennial Valley wetlands. How does the preferred alternative manage those areas?

**Response:** Management common to all alternatives for the Centennial Valley wetlands would be directed by the Red Rock Waterfowl Habitat Management Plan. This plan identifies grazing objectives and guidelines to enhance wetland/waterfowl habitat on specific tracts of public land. Overall, management emphasis would be to maximize opportunities to reestablish and maintain trumpeter swan occupancy. Maintaining a minimum 12-inch residual vegetation stubble height on wetland habitat would enhance nesting security for all wetland-dependent species.

**U3** **Comment:** Strengthening riparian goals with more aggressive management will increase the agencies ability to conserve and improve westslope cutthroat trout habitat.

**Response:** Given existing habitat conditions, some functional-at-risk and nonfunctional riparian areas will take longer to recover, and with a continued presence of livestock on some of these areas, recovery may not occur within the planning period. However priority would be given to improving conditions on westslope cutthroat trout streams through watershed planning.

**U4** **Comment:** What constitutes a “strong upward trend” as opposed to just an “upward trend”?

**Response:** “Strong” has been deleted from all references about upward trend in the DEIS.

**U5** **Comment:** Does anyone really think that management can create that kind of channel change in 15 years?

**Response:** It is unlikely that degraded channels, especially those that are dewatered, will show any significant improvement within 15 years without some sort of physical restoration, regardless of existing uses. However, physical channel reconstruction, flow restoration, vegetation management, and controlled uses can restore properly functioning channel conditions in less than 15 years.

**U6** **Comment:** Alternative C management of Blue Lake should be used because of the presence of grayling.

**Response:** The resource issue identified on p.79, issue 2 is the protection of axolotls that occur only in Blue Lake and nowhere else in the Axolotl Lakes area. Grayling are not present in Blue Lake.

**U7** **Comment:** We believe that 20 years is too long to reach riparian DFC and that restoration must occur to bring streams into compliance much sooner.

**Response:** Existing vegetation composition and stream channel condition on some streams may not physically be able to recover within 20 years. Increasing recovery to the extent possible requires increasingly stringent control of uses affecting vegetation and streambank stability.

**U8** **Comment:** The water table supporting the Centennial Valley wetlands can best be improved by managing the forest better – not just the encroachment. If BLM plans to limit the duration of grazing in riparian areas, they should also increase the density of use.

**Response:** Water availability to sustain wetland function and productivity in the Centennial Valley is dependent on irrigation practices, livestock grazing, seasonal precipitation, and overall watershed yield. Many wetlands in the Valley are dependent solely on surface runoff from the immediate area

and are not related to water yield from forested areas.

The intent of reduced duration of grazing treatments in riparian areas is to reach an appropriate level of use that is compatible with improved and enhanced vegetation community composition and streambank stability.

**U9** **Comment:** The RMP must ensure consultation with the Corps of Engineers to determine the applicability of 404 permit requirements. Projects should assess potential impacts on wetland functions, avoid or minimize wetland impacts wherever possible, and compensate from unavoidable impacts through wetland restoration, creation or enhancement. Spring, seeps and wetlands should be marked on-the-ground prior to avoid disturbance. OHV use should be restricted in ecologically sensitive riparian areas and wetlands.

**Response:** The BLM is well aware of consultation requirements with COE for Section 404 permits, whether issued individually or under nationwide permits. BLM regulations require that riparian/wetland habitats are in proper functioning condition. BLM complies with applicable laws and regulations pertaining to avoidance of impacts to wetlands. Analysis of proposed projects and activities to determine potential impacts to riparian and wetland habitat is required in the NEPA process. The BLM DFO maintains a significant database documenting the location and current condition of riparian and wetland areas across the field office. Current OHV regulations prohibit off-road uses unless on a designated route.

**U10** **Comment:** We recommend that management direction promotes mitigation and/or enhancement of riparian areas, including establishment of riparian conservation areas (streamside buffer zones) to avoid adverse impacts to streams and riparian areas such as the INFISH riparian protection guidelines. Riparian DFC should also be achieved as quickly as possible as recommended under Alternative C.

**Response:** The recommended language is included in the definitions of proper functioning condition for riparian/wetland. Standards for Rangeland Health require BLM to manage riparian/wetland habitats to achieve proper functioning condition as a minimum. Riparian guidelines similar to INFISH guidelines that address acceptable levels of use for riparian habitat management have been developed locally, and are available for implementation on a case-by-case basis. We think management designed to achieve PFC of Riparian areas within 20 years provides a balanced approach to managing existing and future uses of public lands.



- U11** **Comment:** The BLM DFO management apparently totally failed to comply with and/or implement the 1990's Initiative because only 18% (now 21%) of riparian areas are in PFC rather than 75%.  
**Response:** One of the four goals of the BLM's Riparian-Wetland Initiative for the 1990's was to restore and maintain riparian-wetland areas so that 75 percent or more are in proper functioning condition by 1997. BLM continues to strive to achieve this lofty goal. The other three goals of this initiative, we believe BLM is achieving.
- U12** **Comment:** Vegetation height requirements should be made on a site-by-site basis taking into account the various factors that could affect herbaceous cover and emergent vegetation height. It is likely that height requirements will never be met in many areas due to variation in precipitation, elevation, soils, and vegetation types.  
**Response:** Site potential on most permanent and semi-permanent wetland areas is adequate to meet the proposed 12-inch residual stubble height for herbaceous vegetation. Vegetation composition in Centennial Valley wetlands in proper functioning condition is dominated by various taller species of sedge (*Carex*), spike-sedge (*Eleocharis*), foxtail barley (*Hordeum*), and on more permanent-water sites, cattail (*Typha*) and bulrush (*Scirpus*). All of these species are capable of producing 18-60 inches annual growth, and leave a standing residual stubble height of well over 12 inches under moderate grazing utilization. Controlling mechanical damage in this vegetation from livestock bedding and trampling further enhances residual stubble heights. Maintaining these residual heights during periods of drought would require adaptive management to accommodate reduced productivity.
- U13** **Comment:** There is inconsistency between definitions of the successional pathways for riparian plant communities discussed in the DEIS, particularly related to describing a disclimax community.  
**Response:** Disclimax is defined in the Classification and Management of Montana's Riparian and Wetland Sites as: "Where recurring disturbances, such as grazing (e.g., zootic disclimax) or periodic burning (e.g., fire disclimax), exert the predominant influences in maintaining the structure and composition of the steady-state vegetation. Disclimaxes, such as the zootic climax or fire climax, are not the basis for recognizing habitat types."
- U14** **Comment:** BLM should have done a better job working on water production. Grazing, forest and shrub management have caused a decline in historic water flows.

**Response:** Current riparian habitat conditions reflect a variety of past and current impacts that have all influenced water flows. BLM regulations now require riparian and upland habitats to be in proper functioning condition. As improvement in riparian vegetation communities, streambank stability and channel shape occurs, water yield and the availability of water should increase on a small, localized scale.

- U15** **Comment:** How does increased water erosion from surface disturbances fit with faster riparian habitat improvement?

**Response:** BLM guidance is to manage upland and riparian habitats to achieve proper functioning condition. This would reduce upland and streambank erosion, and enhance recovery of stream channels and riparian vegetation communities.

## ROUTE DESIGNATIONS

- V1** **Comment:** A commenter stated "This process should be reversed. BLM should have to request closure and state reasons before closing any roads."  
**Response:** BLM is required to designate areas, roads, and trails during the land use planning process in accordance with regulations provided in 43 CFR 8342 and according to guidance provided in the BLM Land Use Planning Handbook (H-1601-1), **Appendix C**, page 12, and other Instruction Memoranda. The principles adopted by the Western Montana RAC and used by the RAC sanctioned subgroup guided the rationale for route designations.
- V2** **Comment:** Numerous comments identified the need for routes to be designated open because they provided access for private land owners, or for ranchers to administer their permits (i.e. fence maintenance, salt and mineral supplement access, water developments, stock management, etc.).  
**Response:** Although it was not stated specifically in the *Travel Management* section, private landowner access was addressed in the *Lands and Realty* section (page 40) where it says, "Owners of non-Federal land surrounded by public land managed under FLPMA would be allowed a degree of access across public land which would provide for the reasonable use and enjoyment of the non-Federal land." A further clarification of the intent of that has been added to the *Travel Management* section, and to **Appendix I**, which addresses Off-Highway Vehicle Travel Exceptions and Allowances. Among those exceptions identified in **Appendix I** is one that allows "Motorized cross-country travel by lessees and permittees performing administra-

tive functions on public lands within the scope of a permit or lease.” This includes, among other things, ranchers administering their permits.

A paragraph has been added to the *Travel Management* section to more clearly and specifically address the concern over access to private lands. It reads,

*Routes on public lands that are not accessible to the general public (across private or other lands) would be closed to all recreational motorized wheeled vehicle travel except as provided in Appendix I (Off-Highway Vehicle Travel Exceptions and Allowances). Where no reasonable alternatives exist, access to private land using routes crossing public lands that are not designated open to public motorized use would be allowed to the degree necessary to provide for reasonable use and enjoyment of that property.*

**V3** **Comment:** Referring to 17 different identified areas from the Centennial Valley across Antelope Flats to the Lima Peaks and Tendoy Mountains, the commenter wrote “...fall under the same comments as follows: Ranchers and sportsmen use roads in this area for access to recreation areas and grazing management and University studies (geology, biology, and many earth sciences). These activities require access to public lands. Existing road conditions have not degraded since I was 8 years old (34 years) and provide access routes into and through productive public land. Economic effects run deep. The two major industries in this area are ranching and outdoor recreation. Both absolutely require access to public land and closing these roads limits accessibility. These roads also provide access for local residents (primarily) for recreation, to hunt and feed their families, and to gather wood for winter fuel. These purposes are very real and just as important today as it was 30 years ago. Closing these roads will significantly impact residents’ ability to live, work, and protect these areas. Closures also affect our fire fighting ability, as well as EMS access (we have quite a bit of activity here)

**Response:** Ranchers will continue to be allowed to access their lands for performing work associated with their permits as described in the standard exceptions to OHV travel restrictions in **Appendix I**. Sportsmen and other users of the public lands continue to have access to virtually all of the lands that have been accessible by motorized routes in the past. In some cases, existing road conditions have degraded over the last 30+ years, and in many more cases, existing routes have continued to be created over that period of time, spreading weeds, creating new sources for erosion, disrupting wildlife, and interfering with the opportunities of the

non-motorized recreational user to enjoy their public lands. Both the ranching and outdoor recreation “industries” will continue to have adequate access to public lands under the proposed travel management. The public will also continue to be allowed to access the public lands to hunt and harvest firewood. Emergency services such as firefighting and EMS will also continue to be able to access public lands to the extent necessary to perform those duties.

We have attempted to respond to specific comments for specific routes. Some adjustments have been made to the referenced area. Please see related specific comments.

**V4** **Comment:** Referring to an entire area between Clark Canyon Reservoir and the south end of the Pioneer Mountains, the commenter stated “I use all the roads on this map for hunting. Your mapping is all screwed up. You have county roads and private roads closed off.” Referring to all routes on a map of the Blacktail Mountains/Sage Creek area, the commenter stated “I use virtually all of these roads at some time during the year for hunting, four wheeling and motorcycling.”

**Response:** We have made an effort to respond to specific comments about specific routes. This comment is not specific enough to warrant any adjustment to route designations. See responses to specific route comments below.

**V5** **Comment:** Several commenters identified recreational opportunities on BLM lands in the area of the Beaverhead Canyon Gateway, west of Interstate 15 near Barretts Park, (T7S, R10W; T8S R9W; and T8S, R10W) that would be lost by the closure of routes in that area to motorized use. Uses included hunting, camping, wildlife viewing, photography, pleasure driving, hiking, and biking.

**Response:** These concerns were considered by the planning team and the identified routes have been designated open to motorized use in response to these comments. No resource or use conflicts were identified in this area.

**V6** **Comment:** Several short route segments were identified across BLM lands in the area of the Robb-Ledford/ Blacktail State Wildlife Management Areas (T9S, R5W and T10S, R5W) to be opened to provide consistency with designations on FWP lands.

**Response:** Mapping errors were corrected to show these routes open to motorized use.

**V7** **Comment:** In Alternative B, it should show the Shineberger Creek road crossing the Snowline country as public access (T15S, R7W).

- Response:** This road is a county road and the error was corrected to indicate the route as open to motorized use.
- V8** **Comment:** The road through BLM (T13S, R1W, Section 17) in the Snowshoe Creek area should be open to the public. It shows closed in Alternative B.  
**Response:** The route indicated on the north side of the Centennial Valley was left closed to motorized use. It is not the primary route through the area, but is a faint track. The route indicated is not open on refuge or state lands beyond.
- V9** **Comment:** A route north of Bell Canyon within the Bell/Limekiln Canyon WSA was identified as important for hunting access and as an important route from Red Rock drainage to Medicine Lodge. It is the only road in T11S, R11W, Section 14. Other comments suggested that this same route (and the entire WSA) should be closed to all motorized travel to preserve opportunities for quiet recreation.  
**Response:** After considerable debate, it was determined that this well traveled, primary travel route would be designated open to motorized use to allow continued access for hunting and to preserve the potential for a motorized through route from the Medicine Lodge drainage to the Red Rock drainage across the Tendency Mountains.
- V10** **Comment:** One commenter identified the county road through the south Centennial Valley to West Yellowstone (T14S, R1E) as closed to motorized use.  
**Response:** This was a mapping error that occurred only on maps provided for additional non-BLM meetings. This county road crosses state land, and is not subject to any decision within the Dillon RMP.
- V11** **Comment:** Several routes were identified to be open to provide hunting access and general recreation opportunities in the Gallagher Creek area between the Beaverhead River and the Blacktail Mountains (T9S, R10W).  
**Response:** One additional route was identified to be open in the drainage north of Gallagher Creek and on east side of Beaverhead River along the railroad track. A poorly located route up Gallagher Creek was left closed to motorized use because of erosion and weeds.
- V12** **Comment:** Several commenters were concerned that Interstate 15 would be closed across BLM lands.  
**Response:** There is a right-of-way for Interstate 15. It appears there may have been some confusion created by a map that was created specifically for additional non-BLM meetings.
- V13** **Comment:** Two commenters indicated that a route they identified as the county road to Monida was not designated open for motorized use, and that the route received daily use as access to the Centennial Valley (T13S, R8W).  
**Response:** The route indicated in reference to the comment is not a daily access route and is not the county road to Monida. This faint two-track spur was left closed. Primary access into Centennial Valley remains open as shown on Map 47.
- V14** **Comment:** Two commenters identified a route up Caboose Canyon near Muddy Creek and Big Sheep Creek needed to be open to motorized use to provide access for hunting, camping, firewood gathering, hiking, and access to Forest Service lands beyond (T14S, R10W).  
**Response:** The route indicated up Caboose Canyon was designated to be open to motorized use to provide access to the National Forest boundary from the county road.
- V15** **Comment:** A route east of Big Sheep Creek Road near the Peterson Ranch was identified as necessary for hunting, wood cutting, and National Forest access (T14S, R10W).  
**Response:** The routes identified in reference to these comments are very faint spur routes that dead end, and will remain closed to motorized use. A better route in the same area, the spur east of Big Sheep Creek Road in Section 35, was opened to provide additional public land access.
- V16** **Comment:** Two short, spur routes crossing State lands in the vicinity of Wolverine Creek on State lands (T13S, R5W, Sections 11 and 13) should be closed due to steepness of the hills, traffic, and terminating at private lands.  
**Response:** The routes identified in the vicinity of Wolverine Creek are on State land and are not identified to be open.
- V17** **Comment:** Several comments identified a route north of Henneberry Ridge (T8S, R11W and T9S, R11W) that should be designated as open for a variety of reasons including: it is a powerline access route, needed for fire suppression, provides recreation access, hunting opportunities, and needed for ranching access.  
**Response:** This route is not a powerline road, and fire suppression and ranching activities can continue to be conducted on this route in accordance with the OHV travel exceptions provided in **Appendix I**. The diverse interests represented on the

sanctioned subgroup of the Resource Advisory Council discussed this route extensively in their effort to reach consensus on an overall travel management plan that would address the desires of both motorized and non-motorized recreational interests. It was their conclusion that this route should be closed only if a parallel route approximately + mile to the south was designated open across State Lands (a route not previously designated open by the State). This would allow the Henneberry Ridge WSA to be managed for non-motorized use, and still provide reasonable motorized access to this general area, particularly for the purpose of hunting use. DNRC has been consulted on the travel management proposal for this plan, and has indicated an interest in cooperating where possible to help facilitate a reasonable and somewhat comprehensive travel strategy that addressed both federal and state lands. We have adjusted the proposed action to show this route to be designated open to wheeled motorized vehicles so that motorized access can continue to be provided in this area. However, if the route to the south is opened across State lands, it is our intention to close the route through the Henneberry Ridge WSA to provide additional opportunities for non-motorized recreation.

**V18** **Comment:** A route across BLM lands between Big Sheep Creek Road and Williamson Wood Canyon near Muddy Creek in T14S, R10W was identified as necessary to be open to motorized use. The reasons included: access to National Forest lands, alternate access for when the Muddy Creek Road is too wet, and access for hunting, wood-cutting, and disabled access.

**Response:** The identified route was designated open to motorized use from Big Sheep Creek Road to Williamson Wood Canyon Road. An additional route west of this route to the Forest boundary was also opened. A faint route from Williamson Wood Canyon north to the private property boundary in Muddy Creek was closed.

**V19** **Comment:** Three commenters stated that a route to the Big Sheep Creek Ranch property (T14S, R10W) should be closed to motorized use because it dead ends at a bad stream crossing, use would destroy wetlands and wildlife habitat, and it accesses only private lands.

**Response:** The route was shown as closed to motorized use and will remain that way.

**V20** **Comment:** Don't close off our scenic byways.

**Response:** No specific route was identified. BLM does not manage Scenic Byways and we do not know of any that we have closed.

**V21** **Comment:** A route paralleling the Price-Peet Road up the West Fork of Price Creek in the Centennial Mountains (T15S, R4W) was identified as necessary to be open to motorized travel for firewood cutting and hunting access.

**Response:** The RMP's *Planning Criteria* section on page 10 states, "The RMP will incorporate decisions approved in January 2001 regarding travel management in the southern portion of the Centennial Valley." The *Travel Management and OHV Use* section of the RMP states on page 58, "Travel within the Centennial Mountains would be managed according to the decisions made in the Centennial Mountains Travel Management Plan (USDI-BLM 2001a)." We have added language to the *Travel Management and OHV Use* section and to the exceptions section in **Appendix I** of the Proposed RMP/Final EIS to address how travel for firewood would be allowed.

**V22** **Comment:** A large area of mostly State lands north of the Interstate near Snowline (T14S, R7W) was identified as "access to Snowline." One comment suggested that a route not identified in this area provided hunting access and should be open from May 1 to December 1. Comments also suggested it would be "a good handicap area."

**Response:** Most of the area identified is State land. Two routes are designated open to motorized travel across those State lands. One route that crosses BLM lands through Section 4 is an extension of one of the designated routes on State Lands, and has been adjusted to designate it open to motorized travel yearlong to be consistent with the adjacent designation. Page 58 of the Draft RMP/EIS describes how disabled hunting areas would be identified.

**V23** **Comment:** A route between the Knox Ranch and the Wheat Ranch, southwest of the Blacktail Mountains (T11S, R8W, Section 7, Sage Creek Road) was identified as necessary for hunting and ranching access.

**Response:** Designation of this improved road was changed to show as open to motorized vehicles in the event that access becomes available through private lands. Use of this route for ranching is already allowed under the standard OHV exceptions provided in **Appendix I**.

**V24** **Comment:** A short spur route off of the Big Sheep Creek Road in T14S, R10W, Section 27, just north of the Peterson Ranch, was identified as a loop route that should be opened to motorized travel.

**Response:** The short spur route is not a loop route and is not accessible across private lands and was left closed.



- V25** **Comment:** A route indicated in the South Fork of Alkali Creek (T15S, R11W, Section 16) was identified as necessary to create a loop route in this area.  
**Response:** The route indicated in the South Fork of Alkali Creek is a faint, steep two-track subject to erosion, and was left closed. Another route designated in the same area provides access to the forest boundary along the South Fork.
- V26** **Comment:** Comments indicated that certain routes in T6S, R11W and T6S, R12W are not shown as graded roads.  
**Response:** One of the routes is located entirely on National Forest lands. The route located on BLM lands is not a graded road, and was not changed.
- V27** **Comment:** Several commenters identified that the “Argenta Flats Road,” a primary route into Argenta, was shown as closed to motorized travel.  
**Response:** This was a mapping error, and has been corrected to show that route open.
- V28** **Comment:** Routes east of Bannack State Park, between Cold Spring Creek drainage and Grasshopper Creek in T8S, R11W, Sections 9 and 10, were identified as good loop routes which should be open to motorized travel.  
**Response:** The routes identified are well traveled routes with no identified resource or use concerns and have been designated open to motorized use to provide additional access and loop route opportunities. Other less well-defined routes remain closed.
- V29** **Comment:** Comments indicated that an area in the Pioneer Mountains managed by the Forest Service has “well maintained roads to numerous lakes... Map doesn’t show Buck Creek or Willow Creek Roads. Very well used and necessary access to the Pioneers.”  
**Response:** The large area circled on the map encompasses land in the Pioneer Mountains managed by the Forest Service. The BLM Draft RMP/EIS only addresses routes crossing BLM-administered lands or administered by BLM.
- V30** **Comment:** Comments stated that “All the proposed closures surrounding Bannack were and are used as hunting access roads and should not be closed to the public.”  
**Response:** The area and routes indicated are not specific enough to warrant a specific adjustment to travel designations. Adjustments were made in this area based on other specific comments. See responses to comments regarding the routes east of Bannack State Park (Comment V28) and those in reference to the Beaverhead Canyon Gateway area west of Barretts (Comment V5).
- V31** **Comment:** Comments stated BLM should “Close the road through private land, but create a new access through BLM” referring to an area near Pipe Organ Rock in T9S, R10W, Section 10 and the beacon.  
**Response:** The route indicated is designated open to motorized travel on BLM. BLM does not control access on private lands, and new road construction can be considered during implementation of this plan.
- V32** **Comment:** A route in Sheep Canyon in the Dyce Creek area (T6S, R12W, Sections 21 and 28) was identified as Black Mountain access, extremely important for hunting, and a well-used maintained road incorrectly shown as a trail, as well as a loop route that would potentially be closed.  
**Response:** The route indicated was adjusted to designate one segment to be open to motorized travel from 5/15 to 12/1. The segment beyond that will be open 5/15 to 10/15 as it currently is on the South-west Montana Interagency Travel Map.
- V33** **Comment:** Comments indicated that a particular route needed to be open to motorized travel because it is the “main road to Dyce Creek Road,” (T7S, R12W, Section 10) and extremely well used road during hunting season, accessing a large hunting area in the Pioneers. It was also identified as access to red clay pits, as a haul road, and access to loading chutes.  
**Response:** This ridgetop route identified by the comment is not the main access into Dyce Creek. The route identified has been closed during hunting season on the interagency travel map for years. An open route one half mile west provides access into the same area. Access for mineral use or ranching needs can be allowed under standard exceptions to OHV travel identified in **Appendix I**.
- V34** **Comment:** The map shows the main Medicine Lodge Road as a four-wheel drive road. Cars travel this road.  
**Response:** The road inventory information has been corrected to reflect this.
- V35** **Comment:** Referring to a route just north of Clark Canyon Dam near the Lakeview subdivision (T9S, R10W, Section 32), a commenter wrote, “Avoid the private road. Create a loop road through BOR and BLM.” (Other comments received in reference to this route concerned private land access and ranching and utility access, which has been addressed separately in Comment 2.)

**Response:** Road construction can be considered during implementation. The route identified just north of Clark Canyon Reservoir was identified as open to motorized travel.

- V36** **Comment:** Several commenters suggested that a route in the vicinity of Big Sheep Creek Ranch (T14S, R10W, Section 22) should be shown as closed to motorized travel for a variety of reasons.  
**Response:** The route is already identified to be closed to public motorized travel.

- V37** **Comment:** I don't approve of the closure of these roads when people use these for recreation and hunting and fishing. Especially the area west of Melrose.  
**Response:** We have made an effort to address specific comments concerning specific routes. Other specific comments concerning this area have been addressed. See response to Comments V86 and V87.

- V38** **Comment:** Referring to routes in the North Centennial Valley near Fish Creek (T13S, R3W) the commenter wrote "There is no reason to close these roads. They connect other roads in the area, and state and private lands. There are no erosion or habitat problems."  
**Response:** The routes in this area on State lands are currently closed to motorized use. Access to private lands is addressed in the exceptions to OHV travel in **Appendix I**. These routes will continue to be designated closed to public motorized travel.

- V39** **Comment:** Referring to a segment of the Blacktail Ridge Road in T10S, R9W Section 3, the commenter asked "Is this road public access?"  
**Response:** Yes, it is public access. The BLM acquired easements and rerouted segments of road where necessary to ensure public access in this area.

- V40** **Comment:** Several commenters identified the Little Sheep Creek Road (T14S, R9W) as access for hunting, camping, wood-cutting, and much other recreation.  
**Response:** This was a mapping error, and has been corrected to show this route open to motorized travel.

- V41** **Comment:** Referring to at least nine different route segments across BLM lands from Sage Creek (east of Dell) to Maurer Mountain (east of Clark Canyon Reservoir), the commenter stated: "These roads provide for access into and through public land. Land used and cared for by the public. BLM does no maintenance, weed control, or improvement on any of these roads, and they allow for controlled

access on public lands without undue harm to wetlands and wildlife habitat. Closing these roads would encourage cross country travel, just as it has in the past."

**Response:** We have made an effort to address specific comments concerning specific routes. Other specific comments concerning this area have been addressed. See response to other comments regarding routes in this area, for example the comment regarding roads between the Knox and Wheat Ranch (Comment V23).

- V42** **Comment:** Two comments reflected concern that the North Centennial Valley Road would be closed in the vicinity of T13S, R7W, eliminating access to Lima Dam and other lands in the north side of the valley.

**Response:** The North Centennial Valley Road is designated open where it crosses BLM-administered lands.

- V43** **Comment:** The road you're trying to close in Bean Creek, you've already shut all the side roads off up there. You must have walked up there this spring and closed all those. That's where all the firewood is. I think you would rather have a forest fire and let it all burn. At least we're trying to clean some of that fuel for fires out of there. We need that road left open.

**Response:** Routes south of the Centennial Valley were covered in the Centennial Mountains Travel Management Plan, and those decisions will not be changed in this RMP. The specific route identified in the comment is on State lands, which we do not manage. We have not shown it as one that BLM has identified any particular interest in for management of BLM lands.

- V44** **Comment:** Two commenters stated that a route shown in T15S, R10W on the maps provided for a non-BLM meeting does not exist.

**Response:** The route indicated between Meadow Creek and Alkali Creek does exist, and is a well-defined route designated open to motorized travel.

- V45** **Comment:** Some commented "Bachelor Mountain: Vehicle closure area needs to be expanded (as identified on a map provided by the Montanans for Quiet Recreation). Vehicles need to be limited to Watson Creek only. Close to snowmobiles." Others commented this area provides access to other roads, to livestock operations, water tanks, salt licks, etc.

**Response:** In consideration of wildlife management issues in this area, travel management has been modified in the following ways; 1) Routes in this area have been modified to be closed to

- wheeled motorized vehicle use from December 1 to May 15 and 2) The area has been closed to snowmobile use yearlong.
- V46** **Comment:** Ruby Mountains: Spring Canyon Road dead-ends in the WSA (section 32). There is no need to have a dead end road in this WSA. It only invites further trespass. This road should be turned into a non-motorized trail. Laurin Canyon has two access roads to the trail. A trailhead should be created at the WSA boundary and these roads should become non-motorized. Hinch Creek currently has two sections of road open to the state land section. The preferred alternative improves this situation by eliminating one of these sections and keeping access to the private land inholding. Can this access be gained through section 35 (are both parcels owned by the same person?). Two roads give access to private land in section 33. Can access be found through private land? If not, one of these roads should be closed and maintained as a non-motorized trail.  
**Response:** The routes in Spring Canyon, Laurin Canyon, Garden Creek, and Big Dry Creek are county roads to the point where they are shown closed to motorized travel. Some minor adjustments were made to close routes within the WSA beyond the county road segments. The route in the War Hoop Spring area is traditional hunting access and will remain open. Trailhead construction is an implementation action that could be considered under direction provided in the *Recreation* section of this plan if this area were released from further consideration as wilderness.
- V47** **Comment:** I'm especially concerned about the Axolotl Lakes and East Fork Blacktail Creek not being included in your plan (for non-motorized use). I'm also concerned about the spread of weeds into wild areas, something that motors facilitate greatly.  
**Response:** East Fork Blacktail Deer Creek is closed to motorized use, except for the main access route into the camp area / trailhead. Snowmobiles will continue to be allowed in the Axolotl Lakes area consistent with a designation that precedes FLPMA. Wheeled motorized use will be limited to designated routes in this area. These designated routes will continue to be restricted seasonally—closed to motorized wheeled vehicles from April 1 to July 1.
- V48** **Comment:** East Fork Blacktail WSA: Keep closed to snowmobiles.  
**Response:** East Fork Blacktail Deer Creek WSA is closed to snowmobiles and will remain so.
- V49** **Comment:** Little Sheep Creek/West end of Garfield Mountain: Close to snow machines. Borders proposed winter quiet use area on National Forest lands.  
**Response:** We have incorporated your suggestion and closed this area to snowmobile use to be consistent with management of adjacent lands.
- V50** **Comment:** Hidden Pasture Creek WSA: Keep closed to snowmobiles.  
**Response:** Hidden Pasture Creek WSA is closed to snowmobiles and will remain so.
- V51** **Comment:** Henneberry Ridge WSA (T8S, R11W and T9S, R11W): Too many roads. Close road marked on map. Use alternative route picked by travel subcommittee through State lands. Close to snow machines. This is good access from Dillon for quiet winter recreation and a good winter wildlife viewing area.  
**Response:** We have adjusted the proposed action to leave this route open to wheeled motorized vehicles until such time as the State designates a route to the south as open to provide motorized access into this area. The area will remain open to snowmobile use. See the response to Comments V17 and CC5 on the Henneberry Ridge area.
- V52** **Comment:** Alder Gulch: For the first quarter mile there would be a shared use trail in winter then designate the old snowmobile trail up Alder Gulch as non-motorized. Restrict snowmobile use to designated trail (county road) only. This is one of the best wintertime family access points for Ruby and Madison Valley residents for quiet winter recreation activities.  
**Response:** This proposal is a site-specific, activity-level action involving a mix of public and private lands and conflicting user groups. We cannot resolve this in a land use plan decision, but would be happy to work with the affected landowners and user groups on this proposal during implementation.
- V53** **Comment:** Centennial Mountains WSA: Enforce winter motorized closures. Portions of the Sheep Experimental Station need to be closed to snowmobiles.  
**Response:** The Agricultural Research Service administers lands within the Sheep Experimental Station, not BLM. Enforcement is an implementation action, and we will do the best we can to enforce winter motorized closures on BLM lands.
- V54** **Comment:** Bell/Limekiln Canyon: Close all motorized routes the public doesn't have access to (see

map details). Close to snowmobiles to provide for quiet winter recreation.

**Response:** In response to other comments on this area, the route on the ridge north of Bell Canyon was opened to motorized travel. See also the response to Comment V9. The entire area will be left open to snowmobile use to be consistent with adjacent National Forest lands.

**V55 Comment:** Ruby Range WSA: Close to snowmobiles. This has good access for quiet winter use.

**Response:** The Ruby Range WSA was closed to snowmobile use to provide opportunities for quiet winter recreation.

**V56 Comment:** Axolotl/Blue Lakes: Keep stock driveway closed. There were good reasons for its closure (some healing of the land has taken place). There is already too much motorized access. Close to snowmobiles (except for access to Forest land on designated trail only).

**Response:** The stock driveway and the Bachelor Gulch road in the Axolotl Lakes area were recommended open by the RAC subgroup in the Preferred Alternative of the Draft RMP/EIS. Both routes have been identified by members of the public and the Madison County Commissioners as important to provide motorized access to the north end of the Gravelly Mountains. However, we have adjusted the proposed action so that both routes, including the stock driveway will remain closed under this plan to continue to prevent resource damage in a Wilderness Study Area. The area will continue to be open to snowmobile use. See the response to Comment V47.

**V57 Comment:** The roads up Sage Creek and going to Cantral Buttes, I have no idea what you're doing there. We need these roads left open.

**Response:** The area identified in Sage Creek does not provide specific suggestions for route changes or specific rationale for modifying the proposed travel management. The majority of motorized access in this area remains open. Lightly used routes, or those with resource concerns would be closed to motorized travel.

**V58 Comment:** Blacktail Mountains WSA: Close to snowmobiles. Good winter access for quiet muscle-powered recreation.

**Response:** The Blacktail Mountains WSA has been closed to snowmobiles in consideration of identified wildlife issues and to provide for non-motorized winter recreational opportunities.

**V59 Comment:** Referring to an area east of Big Sheep Creek Road near the Peterson Ranch (T14S,

R10W) the commenter said the area "Provides public access to White Pine Ridge." A need for hunting and firewood gathering access was also identified.

**Response:** One route was opened to the National Forest boundary near White Pine Ridge. Another spur route east of the Peterson Ranch toward the National Forest boundary was opened as well.

**V60 Comment:** A large area of BLM lands in the Antelope Flats area north of Lima (T13S, R8W) was identified needing access for "hunting and recreation"

**Response:** Motorized vehicle access is already provided throughout this area. The routes included in the large area circled on the comment map that were designated closed will remain so to help achieve road density objectives.

**V61 Comment:** Referring to a road near Boatman Spring, and accessing the East Fork of Corral Creek near the Continental Divide in the Centennial Mountains (T15S, R5W), the commenter said "This road provides firewood gathering and hunting to my family."

**Response:** This route has been closed for years during hunting season according to the Southwest Montana Interagency Travel Map. It is also closed on state lands beyond. In addition, this plan did not revisit the decisions made in the Centennial Mountains Travel Plan completed in 2001.

**V62 Comment:** Referring to a route indicated in the area of the East Fork of Little Sheep Creek (T15S, R9W, Section 1), the commenter said "This road provides camping and hunting to my family."

**Response:** The route already designated open to motorized vehicles has been extended by approximately one quarter mile to provide for the camping and hunting opportunity identified in this comment.

**V63 Comment:** Comments referred to a large area south of Interstate 15 near Snowline. Comments focused on the need for private land access and range management as rationale for opening some unspecified route or routes in this area to motorized travel. Some comments identified access needs to National Forest lands and hunting access.

**Response:** There are no routes identified on BLM lands in this area that are accessible to the public across private lands or designated open across the State Lands necessary to access the BLM lands. These routes will remain designated closed to public motorized travel, consistent with adjacent land designations.



- V64** **Comment:** Referring to a route that crosses a corner of public land northeast of Kidd (T12S, R9W Section 8), the commenter stated “This road is used for hunting by my family with no other easy access.”  
**Response:** There is no public access to this area. Consistent with the principles provided in **Appendix I**, this route will remain designated closed to public motorized use unless access across private lands becomes available.
- V65** **Comment:** A route just west of Lima Reservoir in the area south of the dam (T14S, R6W) was identified as hunting access.  
**Response:** This route has been designated open to motorized travel to provide access for hunting.
- V66** **Comment:** Referring to two short, isolated route segments across BLM lands near the Upper Whitworth Ranch (Island Butte) (T14S, R11W), the commenter stated “Need to get behind Lichtenberg from the east.”  
**Response:** There is no public access across private lands in this area, and there is no rationale provided for the need to open these routes to public motorized travel. They remain closed to be consistent with the principles developed by the RAC subgroup and adopted by the Western Montana RAC (see **Appendix I** of the Proposed RMP/Final EIS).
- V67** **Comment:** Two commenters identified a route in the area of the South Fork Divide Creek (T12S, R14W) as necessary to maintain a motorized loop route accessing National Forest routes.  
**Response:** The route on BLM lands that was designated open to motorized vehicles in this area has been extended to the National Forest boundary to maintain a motorized loop accessing Forest Service lands.
- V68** **Comment:** Routes located south of State Highway 324 and east of Alkali Creek (T10S, R13W) were identified as necessary for access to the Chinatown Historic Site. One commenter identified a need for loop routes in this area.  
**Response:** The area identified in T10S, R13W, Sections 2 and 11 is incorrectly identified as Chinatown. The correct location for Chinatown is T11S, R13W, Sections 15 and 16. However, in the comment area, an additional well-traveled route was designated open to motorized use to create a loop route. Other routes identified on the map in this area remain closed to motorized use to help achieve road density objectives. In T11S, R13W, a route segment was also designated open across BLM lands in Section 9 in the Colorado Creek area to access the Chinatown area. This was coordinated with Beaverhead County who is working with the landowner regarding access in this area.
- V69** **Comment:** Routes between Horse Prairie Creek and South Fork Maiden Creek (T11S, R13W) were identified as necessary access to National Forest and State lands in the area. Also mentioned was hunting access, historic mine sites, and absence of resource conflicts.  
**Response:** Two segments across BLM land in the area of Horse Prairie Creek were designated open to motorized travel to provide for access to Forest Service and State lands and for general access identified in this comment.
- V70** **Comment:** Various routes in the area of Deadman Creek to Pine Creek, off of the Big Sheep Creek Road, (T15S, R10W) were identified as necessary for public motorized use. Rationale included access for hunting, fishing, and motorized recreation.  
**Response:** A route was designated west of Deadman Creek to provide consistency with a route currently designated open on State lands in Section 16. Routes identified on lands west of the Section 16 State lands will remain closed to motorized travel. The lightly traveled spur routes identified in the area of Pine Creek will remain designated closed to motorized use.
- V71** **Comment:** Referring to several routes in the Maurer Mountain area, east of Interstate 15 near Clark Canyon Reservoir (T10S, R9W and T11S, R10W) the commenter stated “All of these should be open to create a loop road to the top of the ride.”  
**Response:** Routes indicated in T10S, R10W, Section 25 were designated to be open to motorized vehicles to be consistent with adjacent state land designation. The faint route indicated in T11S, R9W will remain closed to motor vehicles where there is no access through private lands.
- V72** **Comment:** Referring to an area just north of Chinatown (T11S, R13W) the commenter stated “Need to leave one access open to FS, also a loop.”  
**Response:** One route segment in Sections 3 and 9 was designated open to motorized use to access National Forest lands in Section 10.
- V73** **Comment:** A route segment was identified as a potential “loop road” near Long Gulch near Jim Brown Mountain, east of Pipe Organ Rock (T9S, R9W, Section 5).  
**Response:** The route identified crossing Long Gulch in Section 5 was left closed to motorized use to avoid an area of erosion and help achieve road density objectives.

- V74** **Comment:** A short route segment was identified in the Divide Creek area (T10S, R8W, Section 29) as necessary to retain an existing loop route.  
**Response:** The route identified as closed across BLM land in the Divide Creek Area was a mapping error and will be open to provide consistency with designated open routes on State lands beyond.
- V75** **Comment:** Referring to routes on BLM lands in the south end of the Blacktail Mountains in the area of Red Canyon/Teddy Creek/West Fork Blacktail Deer Creek (T11S, R6W), the commenter stated “These roads provide access to a large area in the Blacktail. There is no other access to this area. This is a prime hunting and ATV area. Also we use this area for upland game birds. With the closing down of private lands and public lands more hunters are using a much smaller area and increasing the crowds.”  
**Response:** Routes identified in this area have been adjusted to allow additional motorized access to provide for access to hunting opportunities.
- V76** **Comment:** Two route segments were identified on BLM lands on the east side of the Pioneer Mountains (T5S, R9W, Section 6) in the areas of Greenstone Mountain and Brownes Gulch respectively. The comment was simply “Need to be open for access.”  
**Response:** A well-traveled route indicated east of Greenstone Mountain in Section 6 was designated open to the National Forest boundary to allow for continued access onto Forest lands. In the Brownes Gulch area, a mapping error was corrected in the southeast corner of Section 28 to designate that route as open.
- V77** **Comment:** Four areas were identified across BLM lands on the east side of the Pioneer Mountains (T3S, R9W, Section 30) as necessary for hunting access.  
**Response:** In response to this comment, a route was opened running north from Rock Creek Road across Section 30 to provide additional hunting access on a well-traveled route. Routes crossing BLM lands in the Lelow Basin area (T2S, R10W, Sections 25 and 35) were designated open to provide access to National Forest lands near Beal’s Mountain and to provide loop routes in the area. A powerline route between Rieber Ranch and Schuetz Ranch in T3S, R9W, Sections 21 and 28, was left closed to public motorized travel because better routes are available in this area and to help achieve road density objectives. The faint route running on the ridge to the north of Sassman Gulch (T4S, R9W, Section 6) was left closed to motorized travel.
- V78** **Comment:** A large area with numerous route segments was identified north of Bannack State Park as necessary for additional motorized access (T7S, R11W). Rationale included hunting, historic access and mining claims, ATV use, and loop routes.  
**Response:** Two well-traveled routes in the Badger Ridge Area in Sections 29 and 30 and in Sections 28 and 33 were opened in response to public comment. Other lightly used routes in this area were left closed to motorized travel to minimize resource conflicts and help achieve road density objectives.
- V79** **Comment:** A short route segment was identified in the Muddy Creek area (T13S, R10W, Section 6) as necessary for access to other routes in the area. A general comment stated, “All roads in T15S, R10W are essential for access and should remain open. I use them 4-5 times a year.”  
**Response:** A mapping error was corrected to in the Muddy Creek area to show this route segment as open to public motorized travel.
- V80** **Comment:** A route up Sweeney Gulch, north of Island Butte (T14S, R11W), to the National Forest boundary was identified as necessary for access to USFS lands in that area.  
**Response:** The route west of Sweeney Gulch in Section 4 was opened to provide access to National Forest lands.
- V81** **Comment:** A route between Meadow Creek and Cabin Creek in T15S, R10W, was identified as “Great antelope hunting access.”  
**Response:** This faint route between Meadow Creek and Cabin Creek in Section 5 will remain closed to motorized use to help achieve road density objectives.
- V82** **Comment:** A route was identified in the Cow Creek drainage north of Island Butte (T14S, R11W) as a “great road up the bottom of a draw.”  
**Response:** The spur route up Cow Creek in Section 5 was left closed to public motorized travel since adequate motorized access is provided up Sweeney Gulch and to the south of Porcupine Creek.
- V83** **Comment:** Several commenters identified the importance of the Black Mountain road as a high-standard road and loop route.  
**Response:** The route indicated is on Forest Service lands, and not the subject of a decision within this plan.
- V84** **Comment:** Several routes were indicated on a map in the area of the East Fork Dyce Creek.

Commenters stated “Logging Road. Already a good road. No need to close.” “Roads in this area are logging roads built by our tax dollars and shut off by gates.”

**Response:** The area indicated on the map by these comments refers to several routes. A well-traveled two-track route is designated open in this area to provide necessary access. Other routes in this area have been closed during hunting season for many years through the Southwest Montana Interagency Travel Plan. These routes will continue to be designated closed to public motorized vehicle travel.

- V85** **Comment:** Routes were identified to be open to provide loop routes in the area of Jim Brown Mountain, east of Dalys (T8S, R9W, Sections 4 and 5).  
**Response:** The routes referred to run parallel to routes already designated open. They will remain closed to help achieve road density objectives.

- V86** **Comment:** Referring to several route segments on the east side of the Pioneer Mountains (T2S, R9W, Section 15), the commenter stated “Melrose Area. Close off loops, main trails and roads.”  
**Response:** The route identified in Section 15 is not the main access route in this area, it follows a powerline. The main access route along the Big Hole River is open across private and State lands and is already designated open on BLM lands beyond.

- V87** **Comment:** A route identified in the Maiden Rock area along the Big Hole River was said to be the “Vipond to Maiden Rock Mine road” or the “Canyon Creek Road from Vipond Park to Maiden Rock Fish Access.” Comments stated numerous reasons for designating this route open to public motorized travel including; wildflower viewing, wildlife watching, hiking, ATV travel, snowmobile recreation, picnics, photography, and recreational use.  
**Response:** The route identified is not either of the roads named. The route identified is a rough trail beneath a powerline in this area. The road mentioned which provides access from the Maiden Rock Fishing Access to Vipond Park on the National Forest lands is already designated open to public motorized vehicle use in the area of the North Central Mine up Canyon Creek.

- V88** **Comment:** Presumably, though not clearly, referring to route segments in the area of Horseshoe Lake near Gallagher Creek (T9S, R9W), the comment was simply, “Horseshoe Lake.”  
**Response:** Horseshoe Lake is on private land. A route is designated on BLM lands up the Middle

Fork Gallagher Creek through Section 19 to the private land boundary.

- V89** **Comment:** Referring to several routes just west of the Henneberry Ridge WSA (T8S, R11W and T8S, R12W) the commenter stated “This is the only access to the timbered area south of Bannack. We have enjoyed bird hunting, antelope, deer and elk hunting in this area. Access to this area will be a five mile hike just to get across to hunt if the road is closed.”

**Response:** Two routes were opened to motorized travel in this area in response to the comment. One was opened from the Bannack Bench Road east through Sections 13 and 14 of T8S, R12W and into Sections 7, 18, and 19 of T8S, R11W specifically to provide access to the timbered area. Another well-traveled route was identified to the west of the WSA to provide a north-south through route and a loop route opportunity.

- V90** **Comment:** The BLM has an historic opportunity to coordinate management activities with the Forest Service as it applies to the respective management plan revisions. We would like to make the following specific recommendations and request the BLM’s specific attention to these areas:

- The BLM land north of Jefferson Davis Creek is largely roadless, borders an inventoried roadless area, and should be managed as non-motorized.
- The BLM lands in the Muddy Creek Drainage border a roadless area and are important wildlife habitat. The current travel restrictions should be maintained.
- The BLM lands between Barton Gulch and Greenhorn Creek border a roadless area where the Forest Service currently restricts all motorized vehicles to designated routes year round. The Current BLM restriction between Dec. 2nd and May 15th should be extended year round.
- The south side of the Big Hole canyon between Dixon and Divide borders a roadless area and should be managed as non-motorized.
- The current restrictions in the Axolotl Lake area should be extended to include snowmobiles off of designated routes.
- All BLM land in the Robb-Ledford area should restrict motorized use to designated routes given extensive intermingling of BLM and State land and to maintain secure elk habitat and quality hunting experiences.

**Response:** The BLM and USFS have coordinated on our current planning efforts.

We are not aware of a *Jefferson Davis Creek*,

but are familiar with *Jeff Davis Creek* (west of Jeff Davis Peak). The lands north of Jeff Davis Creek are not roadless, and some routes have been designated open to motorized vehicles primarily to provide access to National Forest lands and open roads beyond. BLM lands north of Jeff Davis Peak are largely roadless, and no routes were designated open to wheeled motorized vehicles on those lands. However, those lands remain designated open to snowmobile use, consistent with the adjacent designation on National Forest lands.

Minor adjustments to route designations west of Muddy Creek were made to address issues regarding National Forest access, and to divert wheeled motorized vehicles to better routes in that area. The BLM lands remain closed to snowmobiles.

BLM will limit all wheeled motorized vehicles to designated routes yearlong throughout the planning area. Some of those routes will be further restricted seasonally. The route designation in the Barton Gulch area will remain seasonally closed consistent with the current limitation.

We do not know the location of Dixon, but BLM lands on the south side of the Big Hole River, west of Divide, are managed by the Butte Field Office.

Snowmobile use in Axolotl Lakes area will remain as currently designated to accommodate long-standing historic use. Routes in the Robb-Ledford area will of course be limited to designated routes like they are throughout the planning area.

**V91** **Comment:** The Backroad byway, Big Sheep and Medicine Lodge should be open because it is a county road.

**Response:** The Big Sheep Creek Back Country Byway is open.

**V92** **Comment:** East Fork Blacktail: Both Alternatives B and C offer motorized access in this WSA on Road 963. The road should be closed to motorized use. Access to the campground should be non-motorized in WSA boundaries.

**Response:** The route identified open to motorized use in this area provides access to the trailheads in this area, and has been open to motorized use for many years. One of the primary recreational uses of this area is horseback use, including horseback-based hunting. These activities are consistent with the original intent of the Wilderness Act to provide for opportunities for primitive types of recreation. Even most congressionally designated wilderness areas contain “cherry systems” of one type or another to allow motorized access to trailheads and camping areas.

**V93**

**Comment:** Hidden Pasture Creek: The WSA boundary is drawn to exclude many of the roads in this area. There is no reason to have a dead-end road in section 6(T13S, R10W). The 4WD loop impacts wildlife security and many stream crossings. Bighorn sheep and sage grouse occupy this area. Stream crossings include those in Muddy Creek, an important westslope cutthroat trout stream. For these reasons, it is imperative that the road be closed to motorized use.

**Response:** The identified route will continue to be open from May 16 through December 1 to provide motorized access for multiple uses not in conflict with winter wildlife needs.

**V94**

**Comment:** Bell/Lime Kiln: The Interagency map shows some spur roads open not captured in Alternative A. Should we assume these are closed to motorized use? None of the alternatives remove motorized use in key areas.

**Response:** You are correct that the Interagency map shows some roads open that are not on the Alternative A (No Action) map. Technically, all routes currently open to motorized use would continue to be open under the No Action alternative, however even after further review, we are unable to verify the existence of the routes shown on the Interagency map that are not shown on the Alternative A map. They are not shown on the 1:24,000 topographic map, and are not evident on the satellite photography. If they are there, they would be open under Alternative A. They are not designated open in the Preferred Alternative (Alternative B).

**V95**

**Comment:** Centennials: Alternative C extends the closure dates on roads in the WSA. Although the DEIS claims that travel management has already happened in this WSA, we would like this DEIS to address removal of all motorized access in the WSA. The Centennials are so ecologically important that they warrant motor-free status to protect their wildlife, aquatic, and wilderness values.

**Response:** The Centennial Mountains WSA (27,691 acres) is one of the areas identified as closed to motorized use under 43 CFR 8342.1. A short cherry system extends a route less than one mile into Bean Creek, and the Price-Peet Road extends into the mountains on the west end (outside the WSA) and is cherry stemmed a short distance into the WSA. With these two exceptions, the entire area is closed to motorized use. The Planning Criteria incorporated the decisions of the 2001 Centennial Mountains Travel Management Plan, eliminating the consideration of changes to those decisions in the context of this RMP.



**V96** **Comment:** Blacktail Mountains. With the exception of routes open seasonally, this area [Blacktail Mountains] is secure from motorized vehicle use. It appears that very few changes would have to be made to assure the Blacktails are secured as non-motorized and the wilderness qualities therefore preserved. One of the routes coming in from the west, about half way down the range appears to terminate at a section of State land that already has motorized access. This seems duplicitous and unnecessary, especially for a small area. The provisions in Alternative C are better from a wildlife perspective, with a seasonal closure, but Alternative C still fails to address non-motorized recreation and protection of the wilderness characteristics.

**Response:** The north end of the Blacktail Mountains was closed to snowmobile use in response to this, and other similar comments. The route identified “coming in from the west” was left open to motorized vehicles to allow a reasonable amount of access into this otherwise inaccessible block of public lands along a reasonably well-established route.

**V97** **Comment:** I want the road through Section 1 of T.6 S, R.16 W to remain designated as open as shown in Alternative B. This road is our only access to the private property where our home is located.

**Response:** This route will remain designated open in the Proposed Action of the Proposed RMP/Final EIS. However, access to private property would be allowed as specified in **Appendix I** and in the *Lands and Realty* section of the RMP even if the route had been closed to public motorized use.

**V98** **Comment:** Routes in the Ermont Gulch area should be left open as access to other roads and for recreational use, hunting, livestock watering, inspection, etc.

**Response:** After review of these two specific route suggestions, the route tying into the route into State lands was opened in T6S, R11W, but the route to the east remains closed since it is a dead end route.

**V99** **Comment:** The main road west of Grant should be left open to provide access to other roads.

**Response:** This route is designated open on the maps in the Draft RMP/EIS.

**V100** **Comment:** Leave the routes open in T8S, R10W and in T8S, R12W to close the gap in the middle of the designated route.

**Response:** This change has been made to provide connector routes.

**V101** **Comment:** Access roads in the Rattlesnake Creek area (T6S, R10W) that cross BLM should be designated open so you don’t have to retrace your route.

**Response:** We have designated the short segment indicated as open to create a loop opportunity provided the private landowners allow access.

## SOCIAL AND ENVIRONMENTAL JUSTICE

**W1** **Comment:** One of the concerns of the Counties is that the Counties, as entities, the residents of the two Counties, or some identifiable portion thereof, may be made to bear or will bear a disproportionate share of the burden of the plan’s management decisions, and subsequent actions based on the management decisions, in the administration of DFO public lands.

**Response:** We agree that the probable social effects on the counties and all county residents need to be disclosed in the Draft document and that these effects should be addressed in relation to specific groups. In fact, BLM Instruction Memo No. 2020-167, entitled *Social and Economic Analysis for Land Use Planning*, indicates social impacts must be presented by specific groups or communities because social effects may vary by affected group. The groups that were assessed in the social conditions section of this document include: livestock permittees, outfitters with BLM permits, recreationists (including those who prefer motorized recreation activities and those who prefer non-motorized activities), groups and individuals who would give a very high priority to resource use and groups and individuals who would give a very high priority to resource protection. The groups included in the analysis were identified in discussions with area residents and by examining the scoping letters. The effects were assessed in the context of the Madison and Beaverhead counties’ social environment.

A discussion of the effects to Madison and Beaverhead counties has been added to the *Social* section of the Proposed RMP/Final EIS.

**W2** **Comment:** The racial/ethnic list in OMB Directive 15 should be considered a minimum or starting point from which to begin the analysis. It does help achieve the compelling interest to begin here and verify these minimum standards of EJ are met.

Additionally, the EJ analysis should follow the Grutter standard of individualized consideration by looking at the specific document (RMP EIS), facts and situation (DFO planning area) in completing the EJ determination if any group is bearing a disproportionate share of the negative consequences resulting from the Alternatives.

We further note the Draft EIS uses the legal minimum standard for Environmental Justice (EJ) analysis. The legal minimum is, in the opinion of the Commissioners, significantly less inclusive than the concept of EJ outlined above. The Draft EIS does not disclose why the legal minimum standard was used here and other portions of the Draft EIS go well beyond the legal minimums.

**Response:** The discussion that the Draft uses a bare minimum approach in identifying EJ populations is not valid. Executive Order 12898 specifically deals with low-income and minority populations as the subject of this Order. Other groups that would be affected are discussed in the *Social Conditions* section in Chapter 4.

**W3** **Comment:** These impacts could be analyzed by considering “low income wage earners/consumers/taxpayers” as previously suggested as one of the affected groups or discussing this group and any other group bearing a disproportionate share of the burden in the EJ section.

The Affected Groups analysis might be further improved with the inclusion of a “low income” group. The impacts to minority and/or low-income groups can be obscured by the use of averages. Low-income groups, having lesser monetary resources, are more sensitive to economic and social changes. The social and/or economic costs of the various Draft EIS alternatives may not be significant to upper and middle income groups. However, the economic and social impacts on low-income groups can be quite profound.

The consideration of impacts to low-income populations and minorities is the required starting point for an adequate EJ analysis. Having a “low income” affected group is one method by which the DFO can demonstrate due diligence with EJ requirements.

A review of documents from the U.S. Census Bureau indicates there are low income and minority populations living in Madison and Beaverhead Counties that should be considered under the Environmental Analysis.

**Response:** A low-income group or minority group was not identified for specific analysis because there did not appear to be changes proposed to BLM management that could be related, in any systematic way, to income level or minority identity. Income levels or race for any of the groups that are identified in the Draft are not available and it is certain that any attempt to obtain this type of information would be considered an invasion of privacy.

The Draft RMP/EIS recognizes that there are people with low incomes in the counties. However, there is no evidence to identify them as a low-in-

come group in relationship to BLM. These low-income people are not tied, as a group, to BLM activities that could reasonably be expected to adversely affect them. The Draft RMP/EIS does indicate that the agencies have considered all input from persons or groups regardless of race, income status or other social and economic characteristics.

**W4** **Comment:** Montana ranks very low for social conditions (44th state per Fordham Institute for Innovation in Social Policy) and social issues are relevant to this action. Motorized recreation is a healthy social activity. These types of issues are associated with motorized access and recreation in the project area and these issues must be adequately addressed.

**Response:** The importance of recreation to local lifestyles is discussed in Chapter 3, Social Conditions. Effects on motorized recreation for each alternative are discussed in Chapter 4 under Social Conditions. In addition, this plan references the *Final Off-Highway Vehicle EIS and Plan Amendment for Montana, North Dakota and Portions of South Dakota* which describes the social benefits attributed to OHV use.

**W5** **Comment:** We believe that federal environmental justice compliance regulations as initiated by E.O. 12898 should be applied immediately to correct the disproportionately significant and adverse impacts that motorized recreationists have been subjected to. While some of the guidance published on environmental justice refers to specific minority and low-income populations, the intent of the guidance must be taken in a broader sense as recommended by the EPA in order to avoid discrimination or unfair treatment of any significantly impacted sector of the public. We maintain the intent of identifying low-income populations, minority populations, or Indian tribes is simply to portray examples of affected groups. The EPA guidance supports this conclusion.

**Response:** The discussion that motorized recreationists should be identified as an EJ covered population is not valid. Executive Order 12898 specifically identifies with low-income and minority populations as the subject of the order. Effects to motorized recreationists are discussed in the *Recreation* and *Social* sections of Chapter 4 as are effects to non-motorized recreationists. It should be noted that many non-motorized recreationists also feel they would be disproportionately negatively affected.

**W6** **Comment:** The interdependent relationship between public and private lands must be understood and nurtured. It is a less than desirable outcome

when working ranching families and small timber-dependant communities are crowded out due to loss of traditional business opportunities and ranchette development. In developing this plan revision, the BLM has a grave responsibility to protect public lands and consider impacts to surrounding private lands that are extensions of the same ecosystem. According to Bradford (2003):

*Without the Forest permits, these ranches would likely result in private ranches being broken into smaller land units, resulting in the loss of open space in the valley, the land likely being used more intensively and probably being maintained in a reduced condition. These well managed ranches and National Forest rangelands are providing important sources of clean water, open space, habitat for numerous plant and animal species resulting in greater biological diversity, and contributing to the economic and social structure of the western mountain valleys.*

**Response:** BLM recognizes the interdependence between public and private lands and the effects on traditional business opportunities in the goals for various uses/analyses:

- Economics—Provide for a diverse array of stable economic opportunities in an environmentally sound manner;
- Forest Products—Provide opportunities for traditional and non-traditional uses by incorporating sound ecological principles while contributing to the economic stability of the economy;
- Livestock Grazing—Manage the public rangelands to provide for a sustainable level of livestock grazing consistent with multiple use and sustained yield.

Specific changes to livestock grazing will be determined during the watershed analyses. Alternative B, the preferred alternative, provides for an increase in Probable Sale Quantity of forest products over current conditions.

## SPECIAL STATUS SPECIES PLANTS

**X1** **Comment:** Chapter 2, page 89. *Thalictrum alpinum* and *Sphaeromeria argentea* should be dropped from the list and *Primula alcalina* should be added. *Thalictrum alpinum* is not globally rare and is moderately widespread in Beaverhead County; *S. argentea* is widespread and pretty common in Beaverhead County; *P. alcalina* is globally rare and occurs in sensitive habitat.

**Response:** While *Thalictrum alpinum* is not globally rare it is currently ranked as S2 in Montana and is on BLM's sensitive species list for DFO. It will remain on the list in Table 12. *Sphaeromeria argentea* is also on BLM's sensitive species list

for DFO, but has a global rank of G3G4 and a state rank of S3. Since there are not any known immediate threats to *S. argentea* or its habitat, it has been dropped from the list for sagebrush-steppe habitats in Table 12.

Because it is globally rare, our intention was to include *Primula alcalina* on the list of riparian species for which habitat management plans or conservation strategies would be prepared in conjunction with watershed assessments. It was included on the list of riparian priority species in the text on page 29; however due to an oversight it was not included in the alternative table. We have now added *Primula alcalina* to the list of species for riparian habitats in Table 12 on page 89.

**X2** **Comment:** Chapter 2, page 46. I am not aware of any evidence that *Astragalus*, *Penstemon* and *Thalictrum* populations are adversely affected by livestock grazing. Cattle may eat off the flowers, but research on *Astragalus scaphoides* indicates that this has minimal impact on population viability of long-lived plants. Furthermore it is a good general rule that livestock grazing favors most broad-leaved species at the expense of graminoids. **Response:** We agree with your "general rule" that livestock grazing favors most broad-leaved species at the expense of graminoids; however in some limited areas heavy livestock grazing and trampling have been documented to adversely affect rare plant populations. Since grazing impacts to *T. alpinum* primarily result from trampling, habitat alteration and the increased potential of exotic invasion, the genera *Thalictrum* has been removed from the list of plants that are "susceptible to herbivory" in the Proposed RMP/Final EIS. However, we have not removed *Astragalus* or *Penstemon*.

Vanderhorst (1995) states the major human caused threat to *Astragalus scaphoides* in Montana is cattle grazing. Both *Astragalus scaphoides* and *A. terminalis* are palatable and may decrease under some livestock grazing regimes especially during spring and early summer (MNHP 2004). Grazing and trampling of *Penstemon lemhiensis* by cattle may eliminate plants (Elzinga 1997). Cattle browsed more than 90% of the inflorescences of a large population of *P. lemhiensis* in 2003 and 2004. (Hockett, personal observation). Elzinga (1997) suggests that utilization during flowering represents a negative impact on *P. lemhiensis* that is not offset or ameliorated by dispersal of mature seeds, as might be the case if utilization occurred later in the season.

**X3** **Comment:** The proposal in Table 12, page 92 to emphasize the protection of special areas from certain types of weed treatment activities appears to

be contradictory to the goal of preventing the introduction and spread of invasive and noxious plants.

**Response:** The proposal in Table 12 on page 92 of the Draft RMP/EIS would only prohibit aerial application of pesticides and herbicides if the site-specific analysis on a case-by-case basis determined protection of the values listed could not allow aerial application. Ground application of herbicides and other methods of noxious weed control would not be limited.

- X4** **Comment:** It appears that protection of special status plants and associated habitats will take precedence over treatment of noxious weeds in those habitats. If you are concerned about preserving the native plant communities for those species of concern, an aggressive treatment program should occur in those areas to reduce or eliminate the weeds as rapidly as possible.

**Response:** We share your concern regarding loss of habitat to noxious weeds. Please refer to page 187 of the DEIS, where it is stated under **All Habitats:**

“Invasion of native habitats by noxious weeds and exotic species arguably poses the greatest threat to native plant species and communities. Eradication and/or controlling the spread of invasive plants is essential for the preservation/conservation of special status plant species...” Also see the response to Comment X3.

- X5** **Comment:** The Draft EIS fails to adequately analyze and disclose the impacts wildlife has on other resources and uses. Specifically lacking is an adequate analysis by wildlife species of browsing impacts on the various broad leaf special status species listed in Table 18 and the more general forest and woodland species of willow, cottonwood and aspen.

**Response:** Observations suggest that deer use of *Penstemon lemhiensis* is preferential (Elzinga 1997). In pre-burn monitoring, from 0-72% of the *P. lemhiensis* inflorescences were browsed by wildlife, depending on location & year. In every year of post-burn monitoring all inflorescences were browsed in areas that were grazed by cattle. In areas not grazed by cattle, wildlife browsing was insignificant (Heidel and Shelly 2001).

Little to no wildlife use has been observed on randomly visited rare plant populations in the Dillon Field Office (Hockett, personal observation). A review of Vanderhorst and Lesica (1994), Lesica and Vanderhorst (1995), Heidel and Vanderhorst (1996), and Lesica (1998) failed to reveal evidence of significant wildlife browsing on

any broadleaf special status plant species presented in Table 18.

- X6** **Comment:** Chapter 2, page 24. Under Special Status Species, the “Desired Future Condition” makes sense for species such as sage grouse or westslope cutthroat; however is not realistic for some plant species such as Alkali primrose (*Primula alcalina*). This plant requires a very specific habitat that will never be “well “distributed across the landscape” in a way that will eliminate the need for special management. It will always require special consideration because it occurs in only six high-elevation, calcareous springhead meadows globally and only one in Montana.

**Response:** We have adjusted the Proposed RMP/Final EIS by completely deleting the “Goal” and “Desired Future Condition” statements under *Special Status Species-General* section. The specific goals and desired future conditions for special status species animals & fish were already listed under the appropriate heading on pages 25-28 of the Draft RMP/EIS. While three goals were listed for Special Status Species-Plants on page 28, there was no specific Desired Future Condition listed for plants. We have added the following Desired Future Condition under the *Special Status Species-Plants* section in the Proposed RMP/Final EIS:

#### **Desired Future Condition**

The necessary habitat, biological processes, and disturbance regimes will be present on DFO lands to maintain or enhance populations of special status plant species.

- X7** **Comment:** It would have been nice if the special plant species were listed in English. My Latin isn’t very good.

**Response:** Our intent was to include common English names for special plant species throughout the document as done in Table 18. Please refer to Table 18 when a cross-reference is needed.

## **TRANSPORTATION AND FACILITIES**

- Y1** **Comment:** While BLM road maintenance levels are identified (page 223), information on the existing condition of BLM roads in the Dillon Field Office area is not provided. We believe the RMP should identify road drainage and BMP conditions on the BLM road network, and identify roads which cannot be adequately maintained within agency budgets and capabilities. Is sediment production and transport resulting from poorly drained or maintained roads on BLM lands? Roads can be a major source of erosion/sedimentation problems



impacting water quality. There should be analysis and disclosure of the severity and location of any such road problems.

Management direction should provide direction for minimizing road impacts to water quality, fisheries and wildlife, and for closing and decommissioning roads that cannot be adequately maintained, and therefore, may cause adverse impacts to water quality, fisheries and wildlife. We support management direction that requires inspections and evaluations for identification of existing road conditions that cause or contribute to nonpoint source pollution and stream water quality impairments and fisheries effects, so that necessary road maintenance to upgrade BMPs, improve road drainage and correct deficiencies are conducted. The draft RMP and EIS transportation management direction should be improved to address such concerns. Suggested management direction to correct this deficiency are as follows:

- Roads needed for long term management and public recreation access are managed to provide needed access and to maintain or improve watershed condition, and minimize impacts on water quality, fish and aquatic life, and hydrologic processes.
- Roads not needed for long term management and/or public recreation access, and/or which cannot be maintained within agency budgets or capabilities, are considered for decommissioning.
- Roads scheduled for decommissioning should be analyzed with site specific analysis to determine decommissioning and/or closure methods (such as stabilization, revegetation, with natural drainage restored) that best protects aquatic and terrestrial resources.
- Roads analysis shall be used for road management decisions, including upgrading to address water quality degradation, construction of new roads, reconstruction, closure and decommissioning of roads.
- Road stream crossings should be assessed to see if they adequately provide for fish passage, flood flows, and bedload and woody debris transport, and maintain habitat for aquatic communities and restore connectivity of fragmented habitat.
- Road design and road maintenance should: minimize road construction and reduce road density as much as possible to reduce potential adverse effects to watersheds; locate roads away from streams and riparian areas as much as possible; consider road effects on stream structure and seasonal and spawning habitats and allow for adequate large woody debris recruitment to streams and riparian buffers

near streams if roads must be near streams; minimize the number of road stream crossings; locate roads away from steep slopes or erosive soils; stabilize cut and fill slopes; provide for adequate road drainage and control of surface erosion with measures such as adequate numbers of waterbars, maintaining crowns on roads, adequate numbers of rolling dips and ditch relief culverts to avoid drainage running on or along roads and avoid interception and routing sediment to streams; culverts should be properly sized to handle flood events, pass bedload and woody debris, and reduce potential for washout, and should be properly aligned with the stream channel and designed and placed to allow for fish migration; undersized culverts should be replaced and culverts which are not properly aligned or which present fish passage problems and/or serve as barriers to fish migration should be adjusted; bridges or open bottom culverts that simulate stream grade and substrate and that provide adequate capacity for flood flows, bedload and woody debris are encouraged to minimize adverse fisheries effects of road stream crossings; snow plowing of roads later in winter for log haul should also be avoided to limit runoff created road ruts during late winter thaws that increase road erosion (i.e., it is best to carry out winter logging before late winter thaws and spring break up create conditions that promote increased road erosion during logging truck use); road maintenance (e.g., blading) be focused on reducing road surface erosion and sediment delivery from roads to area streams. Blading of unpaved roads in a manner that contributes to road erosion and sediment transport to streams and wetlands should be avoided. It is important that management direction assures that road maintenance (e.g., blading) be focused on reducing road surface erosion and sediment delivery from roads to area streams; practices of expediently sidecasting graded material (e.g., slough, rocks) over the shoulder and widening shoulders and snow plowing can have an adverse effects upon streams, wetlands, and riparian areas that are adjacent to roads.

**Response:** An appendix on Best Management Practices has been added in the Proposed RMP/ Final EIS (see **Appendix Q**). In addition many of the specific recommendations made in the comment are addressed in BLM road manuals and handbooks. Road specific condition assessments are not a standard component of land use plans. Route-specific issues are addressed during activity-level planning such as in watershed assessments

or in project proposal analyses. See the response to Comment T62 regarding closing or decommissioning of roads.

**Y2** **Comment:** The draft RMP proposes to manage vegetation to reduce fuel loads through controlled burns and timber harvest, but doesn't say whether this will lead to road construction and a net increase in the miles of open roads or a net decrease in the extent of sagebrush habitats. At the national level, the BLM has committed to not take actions that would reduce key sagebrush habitats and should make this clear in this plan. Increased open roads may cause conflicts with a number of wildlife resources.

**Response:** A discussion of how the BLM will treat "new roads" is included in both the *Transportation and Facilities* section and in the *Travel Management and OHV Use* sections of Chapter 2. We have clarified the language in the Proposed RMP/Final EIS. It says in part, "When wildlife displacement, habitat fragmentation, road density, or other resource issues are identified in regard to "new roads", the road system would be managed to maintain no net change in "open" roads over the long term, with the baseline identified as the number of miles designated open in the selected alternative".

**Y3** **Comment:** There are no funds available to maintain the existing trails/roads, we don't need more.

**Response:** BLM is well aware of funding constraints regarding maintenance. The RMP contains provisions to manage for a no net increase in roads over the long-term. See the *Transportation and Facilities* and *Travel Management and OHV Use* sections for further information.

**Y4** **Comment:** You should leave all the present roads open and fix the ones that are bad.

**Response:** See responses to comments in the *Route Designation* and *Recreation and General Travel Management* sections for rationale on open and closed designations. The *Transportation and Facilities* section of Chapter 3 outlines how BLM approaches road maintenance.

**Y5** **Comment:** Limit road building as much as possible in order to protect biological diversity, sustain the economic values of weed-free land and maintain recreational opportunities for everyone. Similarly, curtail off-road vehicle use and prevent the unauthorized creation of de facto roads by off-road vehicles. If new roads must be built, we suggest avoiding the building of roads in lower-elevation grasslands, shrublands, and pine savannah. Roads constructed through forest should be as nar-

row as possible to limit the amount of sunlight reaching the ground. We also advise not bringing in foreign road materials, especially from sources in proximity to weed infestations. Native plant cover should be restored or retained along the edges of roads being built or maintained. Close or remove existing roads whenever possible. Roads that traverse or access low-elevation grasslands or open forest should be given priority.

**Response:** A discussion of how the BLM will treat "new roads" is included in both the *Transportation and Facilities* section and in the *Travel Management and OHV Use* sections of Chapter 2. We have clarified the language in the Proposed RMP/Final EIS. It says in part, "When wildlife displacement, habitat fragmentation, road density, or other resource issues are identified in regard to "new roads", the road system would be managed to maintain no net change in "open" roads over the long term, with the baseline identified as the number of miles designated open in the selected alternative". Generally, roads will be closed and reclaimed following the completion of the project, unless needed for the permanent transportation system. Many of the suggestions made in the comment are decisions made at the activity-level stage with implementation of Best Management Practices. Finally, no off-road vehicle use is allowed under any of the alternatives addressed in the RMP, unless by exception as specified in **Appendix I**.

**Y6** **Comment:** I support improvement of unsafe or environmentally sensitive road sections and riparian crossings on improved, unimproved and primitive roads.

**Response:** Maintenance and improvement of existing roads is considered during site-specific planning.

**Y7** **Comment:** It is apparent that there has been no consideration given in this plan for use of BLM lands by handicapped.

**Response:** The RMP contains references to several laws regarding access by the disabled, including the Architectural Barriers Act, the Rehabilitation Act of 1973 (specifically Section 504), the Uniform Federal Accessibility Standards, the American with Disabilities Act, and accessibility guidelines (see page 219 of the Draft RMP/EIS. In particular, the *Travel Management and OHV Use* section of Chapter 2 addresses provisions to allow for hunting opportunities for the disabled on a case-by-case basis. In addition, the *Transportation and Facilities* section in Chapter 3 describes how BLM has managed (and will continue to manage) the Trail Creek Fishing Access for handicap accessibility.

**Y8** **Comment:** BLM does no maintenance, weed control, or improvement on any of these roads, and they allow for controlled access on public lands without undue harm to wetlands and wildlife habitat. Closing these roads would encourage cross country travel, just as it has in the past.

**Response:** We refer the commenter to the sections on *Invasive Species and Noxious Weeds* and *Transportation and Facilities* in both the Draft RMP/EIS and Proposed RMP/Final EIS for an overview discussion on BLM's road maintenance, improvement, and weed control activities.

**Y9** **Comment:** The evaluation of a balance of opportunities should also include an accounting and comparison of facilities including trailhead facilities at wilderness areas versus trailhead facilities at OHV areas.

**Response:** The Dillon Field Office manages one designated wilderness area with one trailhead/parking area. Trailheads in this area are seldom more than an established pull-out for vehicle parking. There has not been much, if any, demand for more development at trailheads. None of the six "intensive OHV use areas" identified in the OHV EIS is in the Dillon Field Office planning area. Since the BLM, as a matter of policy and fiscal responsibility, limits development of recreational facilities to those areas where they are "necessary to help manage adjacent Public Lands and protect other resource values" (*Recreation 2000, A Strategic Plan*, page 33), there has been no compelling reason to create trailhead facilities where we have no designated OHV areas. OHV users routinely trailer ATVs and motorcycles to their desired riding location just as most horseback riders trailer their horses in this area.

## WATER

**Z1** **Comment:** The BLM must comply with the Clean Water Act. The reference to using Montana Best Management Practices to address non point source water pollution is generally appropriate, although we note that Montana Water Quality Standards require that "Reasonable soil, land and water conservation practices" be used to address non point source pollution. All reasonable land, soil and water practices should be used to prevent further impairments of streams on the 303(d) List of Impaired Streams. Management direction should indicate that in watersheds where there are impaired waters, i.e. 303(d) listed waters, efforts will be made to improve water quality to promote restoration of support of beneficial uses (i.e., attainment of State Water Quality Standards); and where Water Quality Standards are currently met, water quality will

continue to be protected and maintained for beneficial use support. Also, management direction must be consistent with no further degradation of impaired waters and supportive of watershed restoration. 303d streams are not disclosed. The BLM Dillon Field Office should cooperate with the State and local watershed groups to prioritize restoration needs, implement TMDLs and WQRPs, and restore beneficial use support on impaired waters. There needs to be a reference to the Federal Clean Water Act and/or EPA standards in the *Management Common to All Alternatives* section.

**Response:** Chapter 3 explicitly states that public lands are administered in accordance with the Federal Clean Water Act, the Montana Water Quality Act and the Memorandum of Understanding with Montana DEQ regarding Water Quality, 2002. Chapter 2 mirrors the goal of the Clean Water Act. "Goal – Restore the chemical, physical, and biological integrity of the waters in the Dillon Field Office to protect beneficial uses. Chapter 2 restates the commitment of the field office to coordinate and cooperate with DEQ and communities (watershed groups) in the development of Water Quality Restoration Plans which address impaired streams. The Federal Clean Water Act addresses both point and non point source pollution and the BLM is well aware of the requirements of the Act. The Montana DEQ list of impaired streams, also known as 303d listed streams, is posted on the DEQ website and is easily accessed by the BLM and the public. There is no need to duplicate the list. The list addresses non point pollution and indicates probable causes and probable sources of pollution. Probable causes are related to land use and land management practices. The BLM's watershed assessment process identifies BLM land management issues of concern to, not only water quality, but also land health. Land management is adjusted to address issues identified in the watershed assessment process. Appropriate permits are obtained as required in association with the implementation of land management changes. Best Management Practices appropriate to the management activity (forestry, road maintenance, grazing etc ) are implemented in accordance to the Clean Water Act guidance to address nonpoint pollution and to restore beneficial uses. Best Management Practices are key to implementation of TMDLs and compliance with antidegradation provisions of the Clean Water Act and the Montana Water Quality Act. The BLM acknowledges the requirements in the Montana Water Quality Act, specifically that in addition to BMPs, "Reasonable soil, land and water conservation practices" be used to address non point source pollution.

**Z2** **Comment:** RMP management direction should assure public water supplies including groundwater aquifers are adequately protected.

**Response:** Public Water Supplies and groundwater aquifers are addressed in on pages 38 and 203 of the Draft RMP/EIS. The Dillon Field Office has worked with the Montana DEQ Source Water Protection Program staff and as indicated in the RMP will continue to work cooperatively with DEQ. The DFO will work upon request, as is likewise stated in the RMP, with towns to provide technical assistance in the development of Source Water Protection Plans.

**Z3** **Comment:** We believe the RMP and EIS should include some direction for watershed/water quality assessment and monitoring programs for evaluation of watershed and riparian restoration success and achievement of proper functioning condition and beneficial use support (i.e., Water Quality Standards compliance). We suggest addition of a Water Resource Monitoring and Assessment Objective perhaps something like, “Establish aquatic monitoring and assessment programs incorporating adaptive management to monitor and assess water quality, proper functioning condition, and aquatic habitat conditions to measure effectiveness of watershed protection and restoration efforts and progress towards attainment of desired conditions and goals (e.g., sub basin and watershed assessments, landscape and project scale analysis, inventories, BLM wide monitoring, etc.).” Monitoring programs should address the types of surveys, parameters to be monitored, indicator species, budget, procedures for using data or results in plan implementation, and availability of results to interested and affected groups. The monitoring program should include discussion of how the three types of monitoring (implementation, effectiveness and validation monitoring) are incorporated into BLM’s adaptive management program.

**Response:** Water in Montana is the property of the State of Montana. Montana Department of Environmental Quality has an extensive assessment and monitoring program for which the BLM provides funding support. Montana streams cross multiple ownerships as they make their way downstream from their source. The nature of ownership patterns makes water quality monitoring sensible at the State level. The BLM’s focus is on the land it manages. Assessment and monitoring of the land is through the use of field indicators rather than the water column. The control of non point source pollution is through stewardship of soils, vegetation and infrastructure (non point sources). To that end, BLM watershed assessments look at the condition of rangelands, woodlands, stream channels,

riparian vegetation, roads, bridges and culverts, and other infrastructure for their potential to withstand flood and catastrophic fire. Excessive sediment delivery (non point pollution) resulting from rain on snow events, blown out culverts, changes in hydrologic response due to fire, timber harvest, or over grazing can result in reduction or loss of beneficial use. By reducing fire risk, maintaining infrastructure, and active land management practices, the BLM does its part to minimize non point pollution and restore beneficial uses. The DEQ does an excellent job of assessing and monitoring State waters. Duplicating the State’s efforts would not be the best use of taxpayer dollars.

**Z4** **Comment:** We are concerned with vague terms such as potential and desired future condition, and specifically the stated intention that management will be geared towards achieving potential channel types and dimensions within 15 years for Class 1 fisheries and WCT streams.

**Response:** Stream channel morphology is commonly described in terms of dimension, pattern and profile. Streams with similar dimensions, patterns and profiles are often found in similar settings. This has led to stream classification systems. The system gaining acceptance across agencies and in the scientific community is the Rosgen System. Dimension pattern and profile parameters in turn are often surrogates for more technical aspects of stream morphology and sedimentology, such as sediment transport and nearbank shear stress. A growing body of knowledge of stream types and channel evolution is based upon morphological variables. Resource managers use stream parameters and stream types as aids in assessing stream condition and stream types. BLM direction for riparian management is provided in technical manuals such as TR 1737-15, *A User Guide to Assessing Proper Functioning Condition and the Supporting Science for Lotic Areas*.

**Z5** **Comment:** Increasing production of forest products could increase sedimentation and runoff from timber harvest activities. Increases in sedimentation to streams that are impaired by sediment (i.e., 303(d) listed streams) would be inconsistent with the Clean Water Act. To protect water quality resources, the RMP should contain language that prohibits impact to Water Quality Limited Streams (WQLS) or nonfunctional (NF) streams until water quality standards are met or the stream becomes functioning.

**Response:** Stream systems are sustained by runoff and sediment from erosion. Excessive runoff and erosion can result from poor land management practices. Best Management Practices will be



implemented to mitigate impacts and to keep run-off and erosion rates within natural occurrences. The BLM must weigh the impacts from doing nothing against doing something. Using high intensity wildland fire as an example, doing nothing has primary, secondary and tertiary impacts. The primary impact of wildland fire is the impact of the fire itself. The secondary impact of wildland fire is the impact of fire suppression (cat tracks etc). The tertiary impact of wildland fire is the new sediment delivery regime resulting from the new hydrologic condition. The Winslow fire situation exhibits primary, secondary and tertiary impacts. The sediment delivery is logarithmically greater than the pre fire condition and covers an area many times greater that would be involved in prescribed fire to reduce fuel loads.

**Z6** **Comment:** The Jefferson River Watershed Council is currently working with your staff on a project in the Whitetail Basin to determine the affects of juniper encroachment on groundwater and stream flow. We support this project and congratulate you for partnering with Dr. Marlow of MSU to publish the results of the project. We encourage you to continue and increase the number and size of such projects on public lands.

**Response:** The BLM acknowledges the Whitehall Project located in the Butte Field Office; however, it is not an RMP issue

**Z7** **Comment:** We believe that water production and watershed restoration are some of the most important issues that need to be addressed in the Dillon Resource Management Plan.

**Response:** Due to the ownership pattern of BLM lands, it is not possible to perform with any accuracy, an analysis of water yield. Literature does suggest however that good stewardship of the soil and vegetative resources provides dividends with respect to water quality and quantity. It is recognized that some types of vegetation have substantial requirements for water. Anecdotal information from riparian specialists such as Wayne Elmore indicate that degraded streams, under proper management – one of the Standards and Guidelines for Rangeland Health – have the potential to store significant amounts of water as channels are restored, riparian vegetation becomes reestablished, sediments are captured, and floodplains are rebuilt. The Southwest Highlands ID Team, while conducting a riparian assessment on Rochester Creek in the summer of 2003 in the peak of the drought observed just such a condition. Forest Health projects may result in increased available water, however, as stated above, the amount may not be detectable.

**Z8** **Comment:** The Jefferson River Watershed Council decided in 2001 to attempt to address the water quality concerns in the upper Jefferson River watershed on private lands. The Jefferson River Watershed Council is working closely with MDEQ to develop Water Quality Restoration Plans for the water bodies listed on the State 303(d) list. The Jefferson River Watershed Council would like to work cooperatively with the BLM. The Jefferson River Watershed Council is working to address water quality concerns on private lands and would like to coordinate with the BLM as you address water quality issues on public lands. Therefore, the Jefferson River Watershed Council would like to request that funding and technical staff be allotted for this interest through 2007.

**Response:** Funding for watershed groups is not an RMP issue, however the comment has been passed on to the Montana State Office for their consideration in supporting watershed activities.

**Z9** **Comment:** The Draft RMP/EIS indicates that Appendix G provides information on the Dillon Field Office watershed evaluation schedule (page 204), however, we did not see information on schedules or timing of watershed evaluations in Appendix G. We would like to see such information included in the document.

**Response:** The last sentence in the second paragraph of Watershed Assessments, TMDL's, and Water Quality Restoration Plans will be revised to direct the reader to Map 82, BLM Watershed Assessment Priorities

**Z10** **Comment:** Although there are few watersheds within the planning area that are managed entirely by the BLM (page 282), we suggest that in watersheds with multiple ownerships it would be helpful to establish management direction to maintain a list of prioritized watershed or aquatic restoration and recovery projects within each fourth code watershed and to coordinate potential watershed/aquatic restoration projects with appropriate local, State and Federal water quality agencies, and other adjacent landowners.

**Response:** Restoration is handled at the project level, not the RMP level.

**Z11** **Comment:** The RMP fails to adequately discuss the significant contribution of Clark Canyon Reservoir to the Beaverhead River fisheries, water quality, watershed importance, recreation, and the Lewis and Clark Trail. This is important as many of BLM's management proposals are directly tied to the Beaverhead. Clark Canyon Reservoir is listed, but there is no indication that it is managed

and under the jurisdiction of the Bureau of Reclamation. The RMP should discuss management aspects of Clark Canyon Reservoir including annual releases for irrigation and general operating criteria that benefits downstream uses and resources....connecting the importance of Clark Canyon Reservoir with uses made and proposed by BLM on the Beaverhead River.

**Response:** The management, operation and maintenance of Clark Canyon Reservoir are outside the scope and authority of the Dillon Field Office RMP. However, other BLM planning documents have acknowledged the effect that fluctuating water levels released from Clark Canyon Reservoir have affected river bank stability, riparian habitat, and water quality. The Pipe Organ tract is the only public land tract on the Beaverhead River, and the Draft RMP/EIS does not address site specific beneficial and adverse impacts resulting from river flows in the Beaverhead River since those flows are not administered by BLM.

**Z12** **Comment:** I request that the Montana Code Annotated add 75-7-101 to 705 be added this law states that it is public policy to conserve water by protecting, maintaining, and improving the quality and potability of water for public water supplies, wildlife, fish and aquatic life, agriculture, industry, recreation, and other beneficial uses. On page 202 of the RMP/EIS please also mention 75-7-101 to 705.

**Response:** Appendix A and the list on page 202 of the Draft RMP/EIS references the Montana Natural Streambed and Land Preservation Act, Title 75, but erroneously lists Chapter 2 rather than Chapter 7. This has been corrected in the Proposed RMP/Final EIS. The policy statement provided in the comment actually comes from MCA 75-5-101, which is also referenced.

**Z13** **Comment:** On page 89 of Appendix G-the sixth bullet under Common Indicators of Water Quality-second sentence, please add Livestock grazing to the list of sources.

**Response:** We have not made this change. The Standards for Rangeland Health were developed by the Western Montana RAC and are not being modified in the RMP process.

**Z14** **Comment:** Page 98. Water section. Desired Future Condition, bullet #2-intent okay, but should rewrite this for clarity.

**Response:** There were no suggestions as to what was unclear regarding the DFC and it was not rewritten.

**Z15** **Comment:** Page 98, Water section. Last bullet in Management Common to All Alternatives-it is important that you actually list all of the required permits needed to assure full compliance.

**Response:** We do not agree that we need to list all required permits and have not done so. As laws change and evolve, permit requirements may change. We have stated in several places that BLM will comply with all Federal and State law.

**Z16** **Comment:** Table 27 (page 203): Clark Canyon Reservoir is listed, but there is no indication that it is managed and under the jurisdiction of the Bureau of Reclamation. Please list ownership for Clark Canyon Reservoir, as well as the ownership and management of the other reservoirs. Otherwise, the reader gets the impression they are BLM reservoirs.

**Response:** We have added a statement to the Proposed RMP/Final EIS to clarify that BLM does not own or manage any of the reservoirs.

## WILDLIFE, including SPECIAL STATUS SPECIES

**AA1** **Comment:** BLM is tying overall land management to a single species such as sage grouse, westslope cutthroat trout and bighorn sheep.

**Response:** BLM is required to identify and manage for priority wildlife species, particularly if they are listed as special status species. Sage grouse and westslope cutthroat trout are both BLM sensitive species, and bighorn sheep is a priority species for BLM and FWP. Furthermore, management of habitats that support these species also benefits a wide range of other species that occur in those same habitats.

**AA2** **Comment:** There is a tendency in the RMP to improperly interchange habitat types and vegetation community types.

**Response:** The Classification and Management of Montana's Riparian and Wetland Sites defines habitat types as "the land area that supports, or has the potential of supporting, the same climax vegetation type (association). Community types are several major seral plant communities that are stable for a time frame relevant to land management decisions." Riparian vegetation discussions do not interchange these terms.

**AA3** **Comment:** Page 20-23 Sage Grouse Steppe Habitat. The dialogue in the RMP on this subject is very confusing, contradictory, and proposes scenarios that are very unlikely to exist and impossible to manage for, given the criteria.

**Response:** We agree that this section needed clarification. We have modified this section to more clearly state how sagebrush habitat would be managed. We have removed reference to the sagebrush canopy cover classes from Oregon in the Proposed RMP/Final EIS.

**AA4 Comment:** None of the alternatives are acceptable, including the No Action alternative because we are doing very little active management at present due to environmental obstructionism and fish and game single issue objections. We must manage for sustainable ecosystems, not individual uses.

**Response:** BLM policy is to manage public lands to meet the *Western Montana Standards for Range-land Health* which require proper functioning habitats. Implementing on-the-ground conservation strategies that address a variety of habitat and species-specific issues is proactively implementing management that is sensitive to site potential.

**AA5 Comment:** BLM spent too much time addressing wolves, grizzly bears and Canada lynx rather than addressing habitat issues impacting wildlife on public land. Species management is not a responsibility of the BLM. BLM also failed to mention litigation that laid out the foundation for BLM to follow regarding barrier fences to the free movement of wildlife. The wildlife review did not provide literature references regarding sagebrush/wildlife relationships.

**Response:** It is BLM policy to conserve threatened and endangered species and the ecosystems upon which they depend to ensure that all actions authorized, funded or carried out by BLM are in compliance with the Endangered Species Act. It is also BLM policy to ensure that fences or other structures on BLM provide for free movement of wildlife on public lands. The recommendation for management common to all alternatives is to modify fences on BLM lands identified as barriers to wildlife movement consistent with BLM Handbook H-1741-1. It is unnecessary to compile and reference all authorities and case law pertinent to this issue. The DEIS is not intended to provide a comprehensive literature review for any specific topic.

**AA6 Comment:** It may not be appropriate to utilize the same timber harvest standards (blocks of habitat or watersheds) in all situations. Utilizing the 250-acre security block is not appropriate for this area.

**Response:** The RMP provides overall guidance. NEPA processes for individual projects will determine the site-specific applicability of guidelines and standards. It is recognized that forested habitat characteristics in the DFO make it difficult to

utilize a single standard for maintaining wildlife security. Where more extensive forest habitat is available such as in the Centennial Mountains, a 250-acre block may be appropriate. However, more often BLM forested habitat occurs in small, discontinuous blocks, and maintaining wildlife security requires other protective measures, such as road use or seasonal restrictions, that are identified at the project level.

**AA7 Comment:** FWP Game Ranges should not be leased for Oil & Gas.

**Response:** State Game Ranges are subject to No Surface Occupancy (NSO) stipulations if leased for oil and gas. This stipulation cannot be waived, modified or excepted and is adequate to protect the values therein. Any Notices of Intent that are filed for oil and gas leases will be coordinated with FWP. Conditions of approval can be applied to site-specific activities to protect resource values.

**AA8 Comment:** The RMP should include measures allowing FWP participation in designating important wildlife security areas and in designing projects.

**Response:** BLM DFO policy continues to provide for interagency participation of habitat monitoring. FWP is routinely requested to participate in, and review, watershed assessments and proposed projects.

**AA9 Comment:** One mile of open road per square mile should be a maximum density not a target.

**Response:** Road density of one mile open road per square mile represents an objective density that will be addressed during project development. Although travel management goals are to allow no net increase in road densities, the target density may be exceeded where no specific resource issues are identified. Where road densities are less than the target and issues are identified, management will not allow an increase to or beyond the one mile per square mile level except on a temporary basis.

**AA10 Comment:** Travel management alternatives do not adequately reflect wildlife security needs on seasonal habitats.

**Response:** We disagree. BLM has been a partner in the Southwest Montana Interagency Travel Plan since the early 1980s. Alternative B adopts all existing seasonal travel restrictions, many of which were implemented to maintain wildlife security on seasonal habitats. The Southwest Montana Interagency Travel Plan is regularly updated, and as wildlife uses change or additional travel conflicts occur, any additional travel restrictions are included or modified. The "best" (better condition, least dis-

ruptive, etc.) roads or routes were considered in the determination of which roads would be designated in each alternative.

**AA11 Comment:** Barriers that impede wildlife movement should be identified, along with proposed mitigation and a time line for accomplishment.

**Response:** Language from Alternative C regarding linkages and corridors has been incorporated into Alternative B in full except for the statement that would disallow transfer of domestic sheep permits within these areas. It is not reasonable for BLM to establish a timeline for resolving barrier issues since there is generally no public ownership where current major barriers exist (the immediate I-15 corridor for example).

**AA12 Comment:** The RMP should ensure that all allotments on winter range are managed for sufficient winter forage for wildlife.

**Response:** Monitoring has been in place on major elk winter habitats and some mule deer ranges for approximately 20-25 years. Very few of these monitoring transects indicate that forage availability is a limiting factor. A BMP that has been generally applied on public land elk winter habitats has been to limit livestock utilization to 35%. Meeting this standard has rarely been a management constraint.

**AA13 Comment:** Does BLM management propose to increase the amount of wildlife habitat?

**Response:** Habitat availability depends on the particular species being considered and habitat conditions on any specific parcel of public land. Management of that habitat may enhance use by one or more wildlife species over others. Only a limited amount of habitat (land) is present on public lands, and management cannot create any more.

**AA14 Comment:** BLM should have some input to wildlife population goals when they reach levels that affect habitat.

**Response:** BLM DFO routinely has the opportunity to provide input to FWP regarding proposed hunting regulations. Harvest adjustments may be recommended to meet habitat needs.

**AA15 Comment:** Wildlife habitat connectivity and protection should be considered as part of the goal and desired future condition in the wildlife section. Preserve migration/dispersal corridor lands for the long-term survival of species such as grizzly bears and lynx, and incorporate proactive steps in Alternative C to protect wildlife movement.

**Response:** One of the Desired Future Conditions in the *Special Status Species—Animals* section states: “Provide suitable habitat and condition to

allow wildlife species movement between large blocks of habitat and seasonal and special habitats on a localized and landscape scale.” Since connectivity was primarily a special status species issue, linkages and corridors and their influence on general wildlife species were not covered in both the *Wildlife* and *Special Status Species* sections. Specific management actions are proposed in Alternative B of the Proposed RMP/Final EIS (now including all those from Alternative C except disallowing the transfer of domestic sheep permits) that should maintain the integrity of these linkages and corridors for all wildlife species.

**AA16 Comment:** How were priority habitats and species chosen?

**Response:** Priority habitats and species were determined jointly with USFS, FWP and USFWS through landscape planning, special status species list updates, and general monitoring of wildlife habitats. All special status species and their habitats are priority species, and they must be considered in all BLM actions.

**AA17 Comment:** How will forest habitat values be protected in Shaw Basin, Noble Creek, north Tendoys, and Divide Creek in Alternatives B, C, and D? There should be no timber harvest on the few public land forested acres of wildlife security habitat. We recommend that the BLM use road density standards or elk security standards to ensure that roads and vegetative treatments are not impacting wildlife or wildlife movement.

**Response:** Any proposed forest management activities in these areas will be evaluated at the project level where appropriate stipulations may be applied to maintain cover and security values. As general practice, timber harvest “best management practices” and road density targets or standards are used to minimize impacts to wildlife. Stipulations used by BLM are often consistent with provisions contained in FWP and Beaverhead-Deerlodge National Forest plans, but the nature of DFO forested lands (small, discontinuous forest stands) makes it particularly difficult to identify standards that would be required across the entire planning area without taking into account site specific conditions.

**AA18 Comment:** Failure to address livestock diseases that are fatal to wildlife such as bighorn sheep or diseases such as brucellosis that may limit lands available to both livestock and certain wildlife is a major shortcoming of the RMP...

**Response:** See the response to Comment Q6 in the *Outside the Scope* section. BLM bighorn sheep guidelines prescribe sufficient separation of domestic livestock and bighorn sheep to prevent any di-



rect transmission of disease. The grazing regulations require the BLM to cooperate with other state, county and federal agencies in the administration of laws and regulations related to livestock diseases and sanitation. Additional discussion of livestock diseases is not needed in this plan.

**AA19 Comment:** Identify and protect core habitat areas.

**Response:** Important habitats are identified across the DFO. Protection of those areas is determined through site-specific evaluation depending on potential conflicting uses and habitat characteristics.

**AA20 Comment:** The DEIS needs to recognize the value of DFO habitat for pygmy rabbit. How does proposed sagebrush management differ from existing condition?

**Response:** Pygmy rabbit are a BLM sensitive species. Management proposals to maintain sagebrush communities, assess aerial application of herbicides, and prevent mechanical damage to tall big sagebrush stands are made specifically to address habitat needs of pygmy rabbit. Management prescribed in the proposed plan would provide sagebrush canopy cover similar to what currently exists area-wide.

**AA21 Comment:** BLM should evaluate habitat characteristics in a fashion to protect and enhance habitat effectiveness. Snowmobile effects on wildlife should be further evaluated and restrictions implemented to protect habitat where necessary.

**Response:** Most of the concepts suggested by this comment are standard methods utilized in watershed and site-specific evaluations to identify project impacts to wildlife habitat. Snowmobile use in parts of the DFO has been reconsidered with restrictions recommended in some areas, such as Blacktail Ridge and Bachelor Mountain.

**AA22 Comment:** BLM should be opening roads to enhance elk harvest, not closing them.

**Response:** Road management must consider a variety of issues in addition to hunter access. Increased access does not necessarily mean increased harvest if that access simply results in increased displacement of wildlife. The appropriate level of access must consider a balance between habitat security and other resource needs, in addition to potential hunter harvest. We will continue to coordinate travel restrictions with FWP to provide adequate access to meet the harvest goals that they set.

**AA23 Comment:** BLM should consider a no-grazing alternative to determine the long-term impacts on sagebrush communities and obligate species, and

the potential recovery of sagebrush habitats. The NEPA document should disclose areas where future use of prescribed fire is proposed, how noxious weeds, livestock grazing, soils, vegetation, wildlife, and other resources will be affected by such management.

**Response:** The no grazing alternative was considered during alternative development but was not analyzed in detail because FLPMA mandates BLM to manage public lands for multiple use and sustained yield. In addition, resource conditions do not warrant planning area-wide prohibition of any particular use as stated on page 16 of the Draft RMP/EIS. Specific locations where prescribed fire may be recommended in the future will be developed during watershed planning and through site-specific project planning, along with additional NEPA analysis. The DEIS proposes that wildfire suppression efforts will focus on protecting large, isolated stands of sagebrush to maintain wildlife values.

**AA24 Comment:** The DEIS should disclose the impacts of wildlife on vegetation communities and the impact from big game herds that are currently exceeding population goals in some areas. I would like to know where the wildlife corridor is.

**Response** It is recognized that in localized areas, big game browsing and grazing impacts are a concern. However, there is no accurate quantifiable measure of this impact. Overall, this effect is not widespread on public lands in the DFO. Where impacts are noted, they will be addressed in site-specific management in coordination with FWP.

Wildlife corridors represent sections of contiguous, continuous habitat that provide connectivity with other habitat areas. These areas are relatively free of barriers or major human disturbance, and represent routes used primarily by large, mobile wildlife species. These routes are not specifically defined by an exact boundary, however, within the DFO, these corridors generally follow the Continental Divide and the major mountain ranges, and are shown on Map 3 of the Draft RMP/EIS. GIS modeling studies were used to assist in mapping the areas displayed on Map 3.

**AA25 Comment:** Wildlife forage uses should be quantified the same as for domestic livestock. Sufficient, long-term monitoring of wildlife uses and impacts is lacking. The DEIS does not adequately analyze or disclose the impacts wildlife has on the other resources due to a variety of data gaps.

**Response:** It is not feasible to fully quantify the level of forage utilization from all wildlife uses on public lands. Wildlife use vegetation for more than forage and their needs vary from season to season.

Often the cover needed by a species in the early spring may be made available for another use later in the season. Attempting to quantify the exact amount that this effects other uses is difficult and far from an exact science. Where we felt that we could describe these effects, such as how meeting elk hiding cover would affect timber harvest or how meeting nesting cover needs for sage grouse would affect livestock grazing, we described the tradeoffs. Other adjustments that will be needed to meet habitat needs of wildlife will be made on a site-specific basis following the watershed level assessments. An allocation of total annual vegetative production was made in the Mountain Foothill EIS, but this allocation only showed that 19% of the production was allocated to livestock and the remainder was allocated for plant maintenance, watershed protection, wildlife habitat and other multiple uses. We did not re-allocate forage in this planning document.

**AA26 Comment:** Improving riparian habitat conditions and controlling juniper encroachment would enhance beaver occupancy.

**Response:** Restoring proper functioning condition in public land riparian habitat will enhance potential beaver reestablishment where suitable habitat is available on all ownerships throughout an entire watershed. Under all alternatives, BLM would coordinate with FWP to manage beaver where site specific assessments have identified concerns with beaver presence or absence. Restoration includes removing denser juniper stands within riparian areas, specifically from streams along the south Tobacco Root Mountains.

**AA27 Comment:** Sage grouse population declines are not necessarily tied directly to habitat conditions, there are other factors like predators that contribute to the decline.

**Response:** Providing suitable habitat conditions is one aspect BLM can address to enhance sage grouse productivity, increase cover and forage availability, and subsequently reduce mortality from predators, weather and other factors.

**AA28 Comment:** The discussion of sagebrush habitat management is confusing, is unlikely to exist and impossible to manage.

**Response:** We agree that this section needed clarification. We have modified this section to more clearly state how sagebrush habitat would be managed. We have removed the sagebrush cover classes from Oregon from the RMP.

**AA29 Comment:** Adopting the WAFWA guideline for 7" of herbaceous cover for sage grouse habitat is

inappropriate (according to Southwest Montana Stockman's Association) and appropriate (according to Montana Fish, Wildlife, and Parks). Others urge that all objectives for sage grouse outlined in the RMP must be implemented as standards.

**Response:** The Draft RMP/EIS recommends that the Management Plan and Conservation Strategies for Sage Grouse in Montana, including all WAFWA guidelines and recommendations, will be used as the basis for evaluating the effects of proposed management on sage grouse. Site specific activity planning will identify where the guideline is applicable and how it may influence authorized land uses. We have attempted to clarify in the Proposed RMP/Final EIS that the 7" guideline, and any of the other guidelines, will not be applied as standards.

**AA30 Comment:** Only two of the 12 risks to sage grouse identified in the State conservation management plan have been quantified, so "perhaps forging ahead with a habitat focused conservation plan isn't wise."

**Response:** The Management Plan and Conservation Strategies for Sage Grouse in Montana have been finalized and MEPA environmental analysis completed. That document provides a general framework from which to design local sage grouse management strategies. The Draft RMP/EIS states that the State Conservation Strategy will serve as the basis for evaluating the effects of proposed management on sage grouse. This provides a thorough basis from which to address specific habitat issues at the project level. The provisions in the Conservation Strategy will not be adopted as standards and this flexibility will preserve options as new information emerges regarding risks and management.

**AA31 Comment:** The DFO should aggressively restore habitat for sage grouse and initiate conservation planning to be tied to the RMP.

**Response:** The Dillon Field Office will use the Management Plan and Conservation Strategies for Sage Grouse in Montana as the basis for managing sage grouse habitat, and is participating in the Dillon Sage Grouse Working Group to develop local management strategies. Cooperative projects, graduate studies, and activity level planning are underway and will continue to identify site specific sagebrush habitat locations and conditions for sage grouse.

**AA32 Comment:** Why is DFO proposing a 3-mile buffer for O&G sage grouse timing limitations rather than a 2-mile buffer?

**Response:** The Montana Conservation Strategy and WAFWA guidelines recommend that broader buffers around leks are appropriate for migratory sage grouse populations, and where habitat availability and condition indicate that a 2-mile buffer will not protect important nesting or early brood-rearing habitat (#3,4 p. 978, **Appendix A**, MPCSSGM). Sage grouse populations in the southern portion of the Dillon Field Office show at least some degree of migratory behavior which dictates a broader buffer. Furthermore, suitable nesting/brood-rearing habitat around many leks in southwest Montana is not uniformly distributed and may extend beyond a 2-mile buffer. Recommending a 3-mile buffer around leks is consistent with WAFWA guidelines. This is explained on page 50 of the Draft RMP/EIS.

**AA33 Comment:** The NEPA document should disclose areas where future use of prescribed fire is proposed, how noxious weeds, livestock grazing, soils, vegetation, wildlife, and other resources will be affected by such management.

**Response:** It is recognized that fire in certain sagebrush habitats, particularly Wyoming and Basin big sagebrush habitats, can have long-term adverse effects on plant community composition and habitat suitability. Specific locations where prescribed fire may be recommended in the future will be developed and evaluated during watershed planning and site-specific project planning. Any activity level planning and fire suppression activities would be specifically directed to protect or enhance sagebrush habitat in sage grouse breeding habitat (leks and early brood-rearing). The Draft RMP/EIS proposes that wildfire suppression efforts will focus on protecting large, isolated stands of sagebrush to maintain wildlife values.

**AA34 Comment:** There is inadequate attention given to protecting sage-dependent species. The final RMP should recognize the economic and social values of sage grouse. Hunting and recreation viewing are important and should be protected.

**Response:** Sagebrush steppe management is a major component of the Draft RMP/EIS and addresses the needs of a variety of species, especially sagebrush obligates. Emphasis is on habitat management that will support a wide variety of species rather than single-species objectives. The overall goal of implementing the Management Plan and Conservation Strategies for Sage Grouse in Montana is to "Provide for the long-term conservation and enhancement of the sagebrush steppe/mixed grass prairie complex within Montana in a manner that supports sage grouse and a healthy diversity

and abundance of wildlife and human uses." Managing BLM sagebrush habitats to enhance sage grouse habitat/populations will also benefit overall conditions for other sagebrush-dependent wildlife species, and the uses they support. BLM has no authority over hunting. See the response to Comment G5 in the *Economics* section regarding impacts and recreational value of sage grouse.

**AA35 Comment:** There are currently two groups of people most detrimental to sage grouse – study groups and hunters. Cattle are not allowed to graze on BLM ground where leks are located until nesting season is over, but man is allowed to harass the grouse at will. There should be a study: 1) to see if there is actually a positive correlation between cattle numbers on public land allotment and sage grouse population, and 2) to see if sage grouse numbers have declined as studies have increased.

**Response:** There are currently no area-wide restrictions on livestock grazing on sage grouse leks. Where restrictions have been implemented, those restrictions were developed and applied through allotment planning and NEPA analysis. Sagebrush habitat modification and conversion, wild fire, drought, powerline and road development, predators, hunting, and increased human activity, in addition to cattle grazing, have all interacted to influence sage grouse habitat and population changes. Sage grouse trapping activities have been limited to only eight of approximately 35 active leks (no more than five in a single year), and trapping is scheduled to minimize disturbance. Lek monitoring indicates that there have been no changes in sage grouse lek attendance after night-time spotlighting has occurred. Daytime monitoring protocol does not allow any disturbance by BLM or cooperators, and has little effect on sage grouse activities.

**AA36 Comment:** Key sage grouse habitats are identified but are open for mineral/oil and gas development without standards or specific requirements for habitat protection.

**Response:** Stipulations for oil and gas leasing have been identified for sage grouse winter/spring habitat, sage grouse breeding, and sage grouse strutting grounds (leks) to minimize or eliminate habitat modification or disturbance. Proposals for any waivers, modifications, or exemptions of these stipulations are considered on a case-by-case basis. If Notices of Intent are filed on oil and gas leases, conditions of approval can be added during site specific analysis. Stipulations are applied for other types of mineral development during activity level planning as well.

**AA37 Comment:** There is no documentation or data to support closure of any motorized routes in the project area to improve wildlife connectivity.

**Response:** The influence of open road density on grizzly bear, lynx, wolverine, elk, and sage grouse, and wildlife in general, are well-documented in the literature. Avoidance of otherwise suitable habitat, habitat fragmentation, mortality from collisions, increased disturbance, and loss of security are all factors that reflect the interaction between wildlife and roads. A target of one-mile open road per square mile or less has long been a BMP for evaluating logging effects on elk, and is routinely used by FWP, USFS, and BLM. The Biological Opinion prepared by FWS for the Dillon RMP cites eleven different studies or reports that document the direct and indirect effects of roads on grizzly bear.

**AA38 Comment:** Map 3 illustrates DFO public lands that are proposed for management as a wildlife corridor. More information is needed, such as: where are the corridors, can they be delineated, have DFO staff ground truthed the utility of these corridors, do they extend beyond the public lands depicted in the map, what do the corridors connect, where do they go, do they form some sort of coherent plan, what animals use these corridors, when, did all non-BLM ownerships consent to inclusion in these corridors, is this something compatible/consistent with the management direction of co-adjacent land managers or will the BLM be quixotically building segmented corridors from unconnected and scattered parcels?

**Response:** Map 3 depicts areas of public land that are considered Wildlife Dispersal/Migration Corridors and notes what information was used to delineate the corridors for the purposes of the Draft RMP/EIS. Note that only public lands are delineated on Map 3. Management provisions identified in Alternatives B and C for these areas applies only to lands or interests administered by BLM, as is the case for all other identified management. Planning at this scale cannot determine whether or not this management direction is compatible/consistent with adjacent land managers, especially given the number of different landowners surrounding these lands.

**AA39 Comment:** Considering sagebrush steppe as a single habitat for management prescriptions is an oversimplification that can lead to problems.

**Response:** The diversity of different sagebrush types in southwest Montana is recognized, and will be considered at the activity level planning. The draft RMP does not segregate the different sagebrush species since the landscape-scale satellite

imagery used cannot identify sagebrush species. Objectives and management actions included in the Draft RMP/EIS are related specifically to mountain big sagebrush, Wyoming sagebrush, Basin big sagebrush, and others relative their response to disturbances, particularly fire, and their relative abundance and values.

**AA40 Comment:** Standards for Rangeland Health should be used rather than sage grouse conservation strategies. The overall sustainability and health of the habitat should take precedence over any species or use.

**Response:** The *Western Montana Standards for Rangeland Health*, Standard #5, requires that public lands administered by BLM provide habitat as necessary, to maintain a viable and diverse population of native plant and animal species, including special status species. Sage grouse habitat is included in this standard as are other sagebrush dependant species. We agree that the overall goal should be the health and sustainability of the land that we administer.

**AA41 Comment:** DEIS management objectives for sagebrush steppe and sage grouse do not recognize that WAFWA guidelines recommend developing guidelines based on local conditions.

**Response:** The Draft RMP/EIS recommends implementing the Management Plan and Conservation Strategies for Sage Grouse in Montana in its entirety, including the use of local data and information as it is available and applicable. We have adjusted language in the Proposed RMP/Final EIS to provide clarification. Proposed management is based on current sagebrush conditions in the DFO. Additional site-specific information would be developed or incorporated during activity planning.

**AA42 Comment:** Many sagebrush communities in southwestern Montana will not typically produce 7 inches of herbaceous vegetation in a given year, and as sagebrush canopies exceed 15%, productivity of herbaceous vegetation declines rapidly.

**Response:** NRCS ecological site guides for foothills and mountains east of the Continental Divide list bluebunch wheatgrass as a major species of climax plant communities. This grass species represents 40-80% composition (by weight) of the plant community on ecological sites common within sage grouse nesting and early brood-rearing habitats in southwest Montana. These sites could also support a moderate to high composition of other taller, cool-season bunchgrasses that average 2-3' in height, such as slender wheatgrass and green needlegrass, and up to 5' in height for Basin wildrye (Montana Interagency Plant Mate-



rials Handbook). Good to excellent condition Mountain big sagebrush/bluebunch wheatgrass and Wyoming big sagebrush/bluebunch wheatgrass plant associations in southwest Montana support an average bluebunch wheatgrass canopy of 29% and 27% respectively (Cooper 1995). In addition, rangeland health evaluations for 10 different ecological sites supporting 11 different sagebrush habitat types were evaluated in southwest Beaverhead County in 2004, and all indicated that this level of potential productivity was realistic. The guidelines for herbaceous canopy cover were met even at sagebrush canopies that exceeded 15%. However, we have added language in the Proposed RMP/Final EIS that recognizes that in some instances herbaceous production diminishes when sagebrush canopy cover is >10-15%.

**AA43 Comment:** By restricting the use of spring burns, a valuable tool for management is being eliminated.  
**Response:** The recommendation restricting spring burns has been modified. It now reads, *“Impacts to migratory bird populations, during breeding seasons, would be minimized by using measures such as size of treatment area, timing, spacing of treatments, etc. when considering vegetative treatments fire, fuels, habitat improvement, etc.”*

**AA44 Comment:** The DEIS does not refer to the Memorandum of Understanding with FWP that allows two years for FWP review for sagebrush manipulation projects.  
**Response:** The MOU with FWP is listed in Chapter 3 with other laws, regulations and agreements that direct management actions. That agreement was designed for review of any vegetation manipulation projects by FWP.

**AA45 Comment:** Bighorn sheep have been constantly used to limit the areas that can be grazed by domestic sheep, and they are going to be used to change land use, specifically more cattle and sheep off BLM rangelands.  
**Response:** There are no instances on BLM lands where domestic livestock have been excluded specifically because of bighorn sheep. Cattle use is currently authorized on at least portions of the three occupied bighorn sheep habitats. The only restriction proposed is for new domestic sheep grazing permits in areas that are currently occupied bighorn sheep habitat, which is current BLM policy.

**AA46 Comment:** The DEIS should indicate that BLM is taking the appropriate steps to limit domestic sheep grazing in areas with viable bighorn sheep populations, specifically the Tendoy and Greenhorn Mountains.

**Response:** There are no domestic sheep permits in occupied bighorn habitat in the Tendoy or Greenhorn Mountains. BLM's Fish and Wildlife 2000, Mountain Sheep Ecosystem Management Strategy, and the Bureau guidelines for management of domestic sheep and goats, as outlined in IM 98-140, are management considerations in both areas. A provision has been added to Alternative B in the Proposed RMP/Final EIS that states no new or converted domestic sheep permits would be authorized in wildlife migration corridors or linkage habitats which include the Tendoy and Greenhorn ranges. Transfers of existing sheep permits would be allowed to continue.

**AA47 Comment:** Does the DEIS propose to reduce or eliminate all competing uses or disturbance factors from all bighorn sheep habitat in the planning area? Management of bighorn sheep to “reduce or eliminate” competing uses is not appropriate in Alternatives A, B, or D, and does not meet multiple use mandates. Reducing or eliminating competing uses on occupied public land bighorn sheep habitat produces an implied threat to private livestock producers leasing BLM lands. FWP recommends modifying Alternative B to reference the FWP Bighorn Sheep Transplant Guidelines for Newly Established Herds.

**Response:** The language regarding bighorn sheep has been changed from “reduce or eliminate” to “minimize or avoid” to be consistent with the habitat protection goal in BLM's Fish and Wildlife 2000, Mountain Sheep Ecosystem Management Strategy in the 11 Western States and Alaska that states: “Develop and implement mitigation plans and surface use stipulations to minimize or avoid impacts to mountain sheep and their habitat from surface disturbance activities such as mining, livestock grazing, etc.”

BLM's multiple use mandate does not imply that all uses can or should occur on every piece of public land. Bighorn sheep currently occupy a small percentage of historic habitat in the DFO, and the Alternative B recommendation as modified would apply only to occupied public land habitat.

Minimizing or avoiding disturbance activities within occupied habitat will enhance opportunities for bighorn populations to most efficiently use available habitat and, where compatible with other uses, expand into adjoining suitable public land habitat. The effects on bighorn sheep from competing uses and disturbance activities would be determined during activity level planning, and would include coordination and cooperation with State agencies, other land management agencies, and non-governmental organizations.

**AA48 Comment:** The RMP does not indicate any coordination or consultation with FWP. Continued authorization of domestic sheep grazing in historic bighorn sheep habitat on Blacktail Ridge, the Gravellys, and the Sheep Experiment Station precludes any opportunities to reestablish wild sheep on these landscapes. This could be mitigated by extending ACEC protections for the Tendoy and Melrose/Maiden Rock.

**Response:** Local FWP biologists were consulted during the compilation and updating of wildlife information for the RMP. Draft alternatives were offered to area FWP and FS biologists for review and comment, but little feedback was received. DFO does not authorize any domestic sheep grazing on the ARS Sheep Experiment Station or in the Gravelly Mountains.

An ACEC was nominated for bighorn sheep habitat in the Melrose-Maiden Rock and Tendoy areas. This ACEC nomination was determined to have met the relevance criteria but failed to meet the importance criteria because there were no circumstances or qualities that made it more than locally significant when compared to other bighorn sheep habitat in this region. Although we did determine that the Tendoy and Melrose/Maidenrock bighorn sheep areas did not meet the importance criteria, bighorn sheep are a priority species for which BLM manages habitat. The standard management provisions in Alternative B provide adequate protection for bighorn sheep habitats.

**AA49 Comment:** Given the current status of grizzly bear as an endangered species, the agency should choose land management direction that best accommodates the grizzly and its habitat – Alternative C. Proposed focus area vegetation treatments that cause habitat fragmentation are detrimental to the grizzly.

**Response:** Recommendations for managing grizzly bear habitat in migration/dispersal corridors from Alternative C of the Draft RMP/EIS have been incorporated into Alternative B of the Proposed RMP/Final EIS, except that transfers of existing domestic sheep grazing permits could still occur. This will extend additional protections for the grizzly within those areas. It is recognized that road densities are greater than one mile/square mile in some areas, but site specific road densities, and the potential effect specific to grizzly bear, will be determined during project level analysis. Focus areas for forest management treatments are the south Tobacco Root Mountains, south Ruby Mountains, and the north end of the Greenhorn Mountains (adjacent to occupied grizzly habitat on Beaverhead National Forest). Management actions in these areas must incorporate mitigation and constraints to avoid impacts to grizzly bear.

**AA50 Comment:** The information and impact analysis on boreal toads does not accurately reflect the current state of knowledge about boreal toads.

**Response:** The 2004 update of the Montana BLM sensitive species list includes the boreal toad and Northern leopard frog, but deleted the Columbian spotted frog and tailed frog. These changes are reflected in the Chapter 3 of the Proposed RMP/Final EIS. While impacts related specifically to boreal toads are not discussed at the broad scale of a land use plan, we appreciate the information provided by the commenter in regard to effects of fire suppression and exclusion on boreal toad populations.

**AA51 Comment:** The agency must support any claim that various recreational activities pose significant threats to endangered species.

**Response:** The Draft RMP/EIS does not claim that recreational activities “pose significant threats to endangered species.” In general, recreational activities can have a minor contributing disturbance influence in habitats used by any special status species, primarily through road use where road densities are high.

**AA52 Comment:** Why does Alternative B include maximization of unit size for Douglas-fir logging?

**Response:** The recommendation is to maximize unit size in Douglas-fir units only in forest treatment focus areas to enhance bighorn expansion and distribution. This relates specifically to bighorns reintroduced into the Greenhorn Mountains and any proposed treatments in the Davey Creek to Jack Creek areas. The recommendation does not apply area-wide to all Douglas-fir treatments.

**AA53 Comment:** The language for habitat protection for special status species should include the provision that “management will benefit or cause no effect to special status species.”

**Response:** The first bullet under the *Management Common to All Alternatives* section addressing special status species references ESA guidance. Section 7 consultation with the USFWS determines the effect of any given federal action on a species. A determination of “May Effect – Not Likely to Adversely Affect” may allow some minor effects to occur and identify appropriate mitigation. This determination is the basis for many low impact projects when precise effects, both in intensity and duration across a broad landscape, cannot be determined for any given special status species.

**AA54 Comment:** The RMP would do nothing to stem the habitat loss that has reduced sage grouse, native fish, bighorn sheep and wild bison to zero or

nearly so over much of their historic habitat within the project area.

**Response:** The Draft RMP/EIS focuses significant attention to sagebrush steppe habitat suitability for sagebrush-dependent wildlife species, particularly sensitive species such as sage grouse. Existing riparian and aquatic habitat conditions are a constraint to rapid improvement and recovery of fishery habitat, but proposed management will initiate recovery in some areas. Bighorn sheep distribution will continue to be limited by habitat availability, although potential reintroduction sites are identified cooperatively with FWP.

**AA55 Comment:** The Section 7 Biological Assessment and Biological Opinion of formal concurrence should be included in the FEIS.

**Response:** Section 7 consultation has been completed and the Biological Opinion attached to the Proposed RMP/Final EIS as **Appendix R**.

**AA56 Comment:** Why is BLM promoting more wolves on public land? Are we supposed to sacrifice hunting opportunity to feed wolves on our public land?

**Response:** The DFO is included in the central Idaho and Yellowstone Wolf Experimental Reintroduction Areas. BLM, as a cooperating federal agency, is required to evaluate authorized actions for potential impacts to wolves, participate in monitoring of wolf populations and their distribution, and to enhance public education. BLM has very little authority over wolf management actions other than to provide data and recommendations to USFWS and FWP.

**AA57 Comment:** We would like to see a map of lynx habitat components and identification of where timber harvest activities would have to be addressed regarding lynx and lynx habitat.

**Response:** Potential lynx habitat is mapped based on forest habitat types occurring in hydrologic units (watersheds). Much of this habitat occurs in small discontinuous stands throughout the DFO and is depicted on Map 81 of the Draft RMP/EIS. In accordance with the Lynx Conservation strategy, management actions occurring within this potential habitat and any actions that are proposed in specific forest habitat types must be evaluated for potential lynx impacts at the project level. Although suitable forest cover may be available in the Ruby Mountains, McCartney Mountain area, and the Sweetwater Hills, these areas will not be managed for lynx due to isolation and lack of connectivity with other potential habitats.

**AA58 Comment:** Consider food storage strategies for grizzly bear protection prior to delisting to reduce

potential conflicts between humans and grizzlies.

**Response:** Most major BLM public use areas and campgrounds that could provide food storage conflicts are not in areas normally supporting bears. The Draft RMP/EIS identifies areas around the Gravelly Range and Centennial Mountains that will be monitored for developing problems. BLM will pursue and develop food storage orders in coordination with FWP when appropriate guidance and justification is available.

**AA59 Comment:** Address and meet the provisions for lynx identified in the LCAS.

**Response:** Alternative B incorporates all the provisions of the LCAS and will use guidelines and standards from the Conservation Strategy to plan and evaluate projects that may affect lynx habitat. Conservation measures are included in **Appendix D** of the Draft RMP/EIS.

**AA60 Comment:** Do all candidate species listed on page 178 of the DEIS have management plans “that will conserve candidate species and their habitats?”

**Response:** None of the species listed on page 178 of the Draft RMP/EIS are candidate species under the ESA. The fluvial arctic grayling is the only candidate species occurring in the DFO, and a conservation strategy and an assistance agreement for grayling management are in place with FWP.

**AA61 Comment:** The title of the table on page 84 should be birds and mammals not animals because fish are also animals.

**Response:** The title has been changed.

**AA62 Comment:** For your information I am enclosing “Don’t fence Me In-Application of the Unlawful Inclosures of Public Lands Act to Benefit Wildlife”. This reference should also be included in the “References Cited.”

**Response:** Thank you for the article. Since this document is not cited in the text it is not included in the *References Cited* section.

**AA63 Comment:** I refer BLM to previous comments for detailed literature citations that are relevant to this planning effort. I have also enclosed a partial list of literature related to wildlife and fences since none was included in your draft.

**Response:** We realize there is a myriad of literature which is available but not included in our *References Cited* section. The DEIS is not intended to provide a comprehensive literature review for any specific topic.

**AA64 Comment:** Executive Summary—Alternative B. There is an inordinate amount of emphasis placed

on fish and wildlife here and other places in the EIS with the statement “Resource values and fish and wildlife habitats”. Fish and wildlife habitat is a resource value! It needs no separate identification and is of no more importance than water, forest, range, and etc. resources. The method of separation causes one to think fish and wildlife are more important when they are not.

**Response:** We have removed the reference to fish and wildlife habitats.

- AA65 Comment:** Would maintaining 60-70% of the sagebrush habitat in a sagebrush class 4 and 5 condition mean a net increase, a net decrease, or no change in the quantity of sagebrush stands in the >15% canopy class in the DFO? If the 60-70% goal means no change or a net increase in sagebrush stands in the >15% canopy class in the DFO, then we are strongly supportive of the habitat objectives described here for sagebrush canopy.

**Response:** We have clarified the objectives for sagebrush steppe habitats found in the *Wildlife* section and referenced in this comment to be consistent with the Montana sage grouse conservation plan and strategies. In answer to the question, based on vegetation cover types taken from satellite imagery as presented in Table 22 of the Draft RMP/EIS, currently 356,821 acres (about 66%) of the 535,828 acres of sagebrush (not including mountain mahogany) have  $\geq$  15% canopy.

- AA66 Comment:** The BLM is presently preparing a fire management plan that is woefully inadequate in how it addresses potential impacts to Sage Grouse habitats. Special management of Sage Grouse habitats through ACEC designation is one of the few measures that would adequately address the threats posed by the state Fire Plan.

**Response:** The Fire/Fuels Management Plan for the Montana and Dakotas was approved in September 2003 without protest. Design features included in Appendix B of that plan (USDI-BLM 2003b) allow for threats to sage grouse habitats to be addressed during site specific planning. In addition, standard management provisions in the Proposed Action of the Dillon RMP provide for consideration and protection of sage grouse habitats.

- AA67 Comment:** BLM does not directly address population numbers nor the apparent authority of FWP. But, throughout the RMP, BLM is quoting information concerning birds and animals in such a way that one wonders where they receive the information from. We are requesting dates and information provided by FWP to BLM to implement this RMP.

**Response:** The planning criteria presented on page 10 of the Draft RMP/EIS clearly recognizes the State of Montana’s responsibility to manage fish and wildlife populations, including hunting and fishing uses. Information included in the Draft RMP/EIS and the Proposed RMP/Final EIS comes from a variety of sources, including spatial data that is updated at regular intervals and acquired from FWP. In general, our BLM biologists do not track each contact made with FWP representatives with regard to update of information, population numbers, etc.

- AA68 Comment:** BLM should not allow reintroductions when there is a known possibility of conflict with other uses of the land. A good case in point is the bighorn sheep in Greenhorn Canyon just south of Ruby Reservoir. What a waste of resources (sheep), people’s time, and the money it has taken to “plant” the sheep and then destroy them. I sure hope BLM was not a party to this fiasco.

**Response:** Determining the viability of reintroduction areas for bighorn sheep is the responsibility of the Montana Fish Wildlife and Parks. The BLM has worked closely with FWP on the reintroduction of bighorn sheep in three areas in the Dillon Field Office in the past and will continue to do so in the future. The Bureau guidelines for management of domestic sheep and goats, as outlined in IM 98-140, are applicable where bighorn sheep are reintroduced or where they currently occupy habitat on public lands. The compliance with Bureau policy is described on page 16 of the Draft RMP/EIS and the specific policies related to wildlife management are listed on page 162.

## WILD AND SCENIC RIVERS

- BB1 Comment:** The Draft EIS, the Wild and Scenic Eligibility report, public comments and information in the decision record fail to affirmatively demonstrate that any of the 10 Wild and Scenic river segments meet the criteria to be determined eligible or suitable. Map 75 does not accurately depict the eligible stream segments.

**Response:** None of the Wild and Scenic River segments determined to be eligible are recommended as suitable in the Preferred Alternative. Comments regarding the inventory and eligibility of streams within the planning area have been previously reviewed and were addressed in the Final Report on Wild and Scenic River Eligibility Determinations released in July 2002 (USDI-BLM 2002). Our review of Map 75 indicates it is consistent with the eligibility findings identified in the November 2002 report.



**BB2** **Comment:** EPA also encourages the BLM to consider the three Madison River segments (Cliff Lake to Varney Bridge, Powerhouse to N. Wilderness Boundary, N. Wilderness Boundary to Grey Cliff) for recommendation as wild and scenic river designations. The information presented in the Wild and Scenic Rivers Suitability Study (**Appendix L**) appears to show that these Madison River segments possess eligible characteristics for wild and scenic river designation, and we believe that such designation would promote long term protection of these river segments.

**Response:** The primary reason these river segments were not recommended suitable under the WSRA is concern over drawing additional recreational use to these segments. All three segments are already approaching critical levels of visitor use, and management has already been discussed between BLM and FWP to consider methods to address this concern. Even the segment that runs through the Bear Trap Wilderness is of concern, in many instances having already exceeded the standards set in the Wilderness Management Plan for social contacts in the wilderness. The lower segment has been identified to be withdrawn from mineral entry, the wilderness segment is already withdrawn, and the upper segment is not considered to have significant potential for locatable minerals. The non-wilderness segments are identified to be within VRM Class II to protect the visual integrity of the corridors, and the wilderness segment is considered adequately protected by the wilderness designation. There are also Oil and Gas leasing stipulations identified for the entire corridor even though potential is considered very low throughout the corridor. In short, we believe there is adequate management prescribed to protect the outstandingly remarkable values identified along these segments without drawing additional attention and compounding an emerging problem of high recreational use levels.

## WILDERNESS and WILDERNESS STUDY AREAS

**CC1** **Comment:** Recommend all Wilderness Study Areas within the Dillon BLM for future wilderness consideration.

**Response:** BLM's recommendations on Wilderness Study Areas (with the exception of the Tobacco Root Tack-ons WSA) were forwarded to the President in 1991 and to Congress later that year. These recommendations cannot be revised once submitted.

**CC2** **Comment:** It is difficult for the snowmobile user to distinguish wilderness or closed area boundaries where no obvious geographic feature marks the

boundary. In wilderness or other areas with motorized closures, snowmobile users should be protected against inadvertently entering wilderness or closed areas. Ecological and wilderness values could be protected by designating non-motorized buffer zones around all wilderness.

**Response:** BLM will continue to post motorized vehicle closures as appropriate and try to improve compliance and enforcement as discussed in other comments related to travel management enforcement. We cannot consider "buffer zones" around wilderness, and fail to see how the job of posting boundaries would somehow become more feasible by expanding the area in need of signing. Snowmobile users, like all public lands recreation users, are responsible to know where they are and abide by the rules for that area.

**CC3** **Comment:** We see that the draft plan proposes less than one percent of the planning area for designation as wilderness. One percent is not a reasonable balance between preservation and development. Please recommend all 10 WSAs for wilderness designation. Montana citizens have devoted their volunteer efforts and considerable expertise to studying these areas, and we believe their proposal deserves BLM's support in this plan.

**Response:** As identified on page 10 of the RMP under Planning Criteria and Legislative Constraints, "Boundaries and recommendations on Wilderness Study Areas (WSAs) identified as a result of inventory conducted prior to October 21, 1993 under Section 603 of FLPMA and awaiting action by Congress will not be changed by the RMP." BLM's recommendations on Wilderness Study Areas were forwarded to the President in 1991. Those recommendations were forwarded to Congress later that year, and continue to await Congressional action. BLM is required under Section 603 (c) of FLPMA "...until Congress has determined otherwise..." "...to manage such lands...in a manner so as not to impair the suitability of such areas for preservation as wilderness..." Therefore all WSAs that are part of BLM's recommendations which have been signed by the President, and forwarded to Congress will continue to be managed according to the Interim Management Policy for Lands Under Wilderness Review (IMP) until such time as Congress acts on those recommendations to either designate them as wilderness or release them from further consideration as wilderness.

**CC4** **Comment:** Consider designating the ten WSAs for non-motorized use during all seasons. Protecting these highest wilderness quality lands, the wildlife security they hold and having places for non-motorized recreationists to go on a mere 13 per-

cent of the entire resource area certainly does not seem like too great of a request.

**Response:** Management of WSAs according to the IMP basically requires “nonimpairment” of the values that existed at the time of the wilderness inventory. In most cases, this allows for the continuation of uses that existed, continued use of existing facilities (including motorized vehicle routes), and virtually any other activity that is determined not to impair the wilderness values that existed at the time of the inventory. (See the IMP, pp. 5 and 9 for more detailed description of management to the nonimpairment standard)

Under Wilderness Study Areas, Management Common to All Alternatives, Page 68 of the Draft RMP says the WSAs “...would continue to be managed according to the Interim Management Policy... until such time as Congress either designates them as wilderness or releases them from further consideration as wilderness.” The IMP says with regard to motor vehicle use, “Mechanical transport, including all motorized devices as well as trail and mountain bikes, may only be allowed on existing ways...” (p. 16) It also says, regarding “existing facilities;”

*“Some lands under wilderness review may contain minor facilities that were found in the wilderness inventory process to be substantially unnoticeable. For example, **these may include primitive vehicle routes (“ways”) and livestock developments. There is nothing in this IMP that requires such facilities to be removed or discontinued. On the contrary, they may be used and maintained as before, as long as this does not cause new impacts that would impair the area’s wilderness suitability.**”* (p. 12)

Although we have the ability to make travel management decisions in the land use plan process that exceed the minimum requirements of the IMP, we have attempted to make travel management decisions that balance the needs of all the users of the public lands. Those needs include a multitude of recreational uses and resource uses including; hiking, hunting, firewood collection, livestock management, mineral exploration, snowmobiling, skiing, rockhounding, bird-watching, wildlife viewing, driving for pleasure, motorcycling, ATV riding, camping, geocaching, and countless other activities.

We have attempted to strike an appropriate balance with the travel management designations proposed in this plan. It is likely that 100 different people would arrive at 100 uniquely different travel management scenarios, and none would necessarily be “right.” The proposed action is our best effort to balance the many needs of the public re-

garding motorized access on public lands in the Dillon Field Office.

## CC5

**Comment:** The BLM is allowing use of roads within WSAs. This includes a network of roads in Axolotl Lakes, East Fork Blacktail, Ruby Mountains, Bell Limekiln Canyon, Farlin Creek, Henneberry Ridge, Hidden Pasture Creek, and the Tobacco Root Tack Ons. In fact, the only WSA that does not have motorized use permitted is the Centennial Mountains because unlike the others, it was recommended for wilderness. By allowing uncontrolled motorized use in these areas, the BLM is jeopardizing their inclusion into the National Wilderness Preservation System. In fact, many types of motorized and mechanized transport that are common today in our WSAs were rarely if ever used in these areas when they were designated WSAs. These include ATVs and mountain bikes.

**Response:** Actually, all WSAs are managed according to the IMP whether they are recommended for wilderness designation or not. Parts of the Blacktail Mountains WSA, Ruby Mountains WSA and Farlin Creek WSA were also recommended for wilderness designation in 1991. Management of WSAs according to the IMP basically requires “nonimpairment” of the values that existed at the time of the wilderness inventory. In most cases, this allows for the continuation of uses that existed, continued use of existing facilities (including motorized vehicle routes), and virtually any other activity that is determined not to impair the wilderness values that existed at the time of the inventory (see the IMP, pp. 5 and 9 for more detailed description of management to the nonimpairment standard).

## CC6

**Comment:** The BLM eliminated protection for the Tobacco Root Tack On WSA, which the Sierra Club has serious problems with since the Tobacco Roots have always been a part of the conservationists’ statewide wilderness proposal. Any decision on the Tobacco Root Tack On should be delayed until Congress acts on wilderness decisions for adjacent Forest Service lands in the Tobacco Root Range.

**Response:** The Tobacco Root Tack-on WSA consists of only 860 acres of BLM lands in two separate parcels on the perimeter of an area of USFS lands currently identified to provide for motorized recreation under the forest plan. One of the two parcels contains a small private land inholding near Shaky Spring (a patented mining claim), and the other is almost completely separated from USFS lands by another larger block of private lands. Even allowing that the USFS could elect to do some-

thing different through their current plan revision, these two small BLM parcels do not contribute significantly to the value of any wilderness proposal that might be considered for the nearby USFS lands, and are separated from each other by more than 3 miles. Under these circumstances, there does not appear to be any persuasive reason to continue to identify these lands as a WSA.

**CC7 Comment:** Claiming this area is too small [Tobacco Roots Tack-on WSA] for wilderness management is not justified and the BLM has provided nothing to back up this claim.

**Response:** Section 603 (a) of FLPMA established the criteria by which the BLM would review its lands for wilderness values. It says in pertinent part, “Within 15 years after the date of approval of this act, the Secretary shall review those roadless areas of 5,000 acres or more and roadless islands of the public lands...” BLM developed a Wilderness Inventory Handbook published September 27, 1978 that reiterated the 5,000 acre minimum for wilderness inventory. Some lands that were less than 5,000 acres were inventoried under provisions of Section 201 of FLPMA, which required an ongoing inventory of BLM lands for the purposes of land use planning. There were no acreage limitations established under Section 201 because this section of FLPMA did not specifically address wilderness. The Tobacco Root Tack-on WSA was designated under the provisions of Section 202 of FLPMA, a land use planning section of the law.

**CC8 Comment:** With regard to the Wilderness Study Areas that you are impacting, you have a legal responsibility to prevent ANY increase in use over 1977 levels. It is unlikely that you have stayed within the law already but this would be a chance to do so.

**Response:** We are unaware of any such legal responsibility. Our legal responsibility is defined in Section 603 (c) of FLPMA which is discussed in response to other comments in this section. BLM has no legal responsibilities to manage to maintain any particular use levels in WSAs or otherwise unless they become the cause of impairment of wilderness conditions.

**CC9 Comment:** The BLM must take a more balanced approach to snowmobile use in the RMP revision. To start, we again reiterate here that designating all of the Wilderness Study Areas for non-motorized use only is a good place to start. These lands already have additional restrictions on them due to the IMP, and therefore seem a logical place to start the discussion.

**Response:** Additional areas have been identified to be closed to snowmobile use in consideration of this, and other similar comments. However, all WSAs have not been closed to all motorized use for various reasons explained in the response to other comments. See the responses to Comments T39, V90, V96 and CC12.

**CC10 Comment:** Logging in Ruby Mountains WSA. Pages 69-70 of the draft plan. We urge BLM to wait until Congress has made the decision on wilderness designation, before committing any WSA to uses that would prevent its preservation as wilderness.

**Response:** Page 69 of the Draft RMP, under Management Common to All Alternatives says that the WSAs “...would continue to be managed according to the Interim Management Policy... until such time as Congress either designates them as wilderness or releases them from further consideration as wilderness. Beneath each of the alternative headings is a line that says something like, “In the event any or all of the remaining WSAs would be released during the life of the plan, the following management would be applied under this alternative.” The management actions identified for each of those WSAs would be applied only after they are released from further consideration as wilderness. (If Congress designates them as wilderness, a wilderness management plan would be written specific to any area designated wilderness.) It says all this on pages 68 and 69.

**CC11 Comment:** Axolotl Lakes WSA – We also appreciate the commitment to semi-primitive, non-motorized management here. However, this commitment is not reflected in the proposed alternative. Under both alternatives B and C, the WSA is open to both snowmobiles and ORVs. Worse, the BLM is proposing to expand motorized use in this WSA. We are very concerned about the re-opening of certain routes to motorized vehicles and will continue to vigorously oppose such actions. In order to maintain the wilderness characteristics of this WSA, it should be designated non-motorized use only. The BLM can still, however, consider special use permits for limited snowmobile activities during individual events, lasting no more than 24 hours.

**Response:** The routes in this area which were proposed to be re-opened to wheeled motor vehicles will remain closed to such use at least until such time as the Axolotl Lakes WSA may be released by Congress from further consideration as wilderness. At that time, designation of those routes for wheeled motorized use will be addressed in a sepa-

rate site-specific decision. The area will continue to be open to snowmobile use, consistent with an area designation that precedes passage of FLPMA in 1976, and in consideration of historical use of that area.

Semi-primitive non-motorized recreation will continue to be the emphasis of recreation management for this area except for the continued allowance of seasonal snowmobile use. The recreation management opportunity description for the area has been modified in the plan to address this correction. All areas within the planning area identified to emphasize non-motorized recreation opportunities will continue to allow motorized use on designated routes, but will not favor activities that increase motorized use. The Axolotl Lakes SRMA is a priority for development of a Recreation Area Management Plan, in coordination with Montana FWP, and this issue will be addressed in that site-specific planning effort.

**CC12 Comment:** Ruby Mountains – We appreciate the commitment to manage the recommended wilderness portion as non-motorized. However, splitting a small mountain range between motorized and non-motorized kind of defeats the purpose of protecting wilderness qualities. Splitting the baby simply invites issues of trespass. Again, with an “island” range that’s relatively small, it makes no sense to further fragment an area with motorized routes that is already vulnerable to fragmentation. We also request that the NSO stipulations be extended to all of the WSA lands in the Rubys and not just the recommended wilderness portion.

**Response:** The recommendation of a portion of this area for wilderness was based in part on the ability to manage it as wilderness. Managing this portion as wilderness includes managing it to prohibit motorized uses. This area is also identified in this Proposed RMP/Final EIS to be closed to snowmobile use. Regarding the NSO stipulations, the south half of the Ruby Mountains WSA is considered to have “very low” potential for oil and gas development. We think the NSO stipulation will adequately protect this area. See the response to Comment P3 for additional discussion. All of the specific management prescriptions identified on page 69 and beyond in the draft plan describe management that would occur if the area is released by Congress from further consideration as wilderness. At that time, it is expected that our management of these areas will change to recognize other potential resource uses.

**CC13 Comment:** Recommendation: If the US Congress decides to release the WSAs from their current designation, BLM should continue to manage these

areas for their wilderness values. Rationale: These areas are the best of the best and the values recognized in their designation should be preserved.

**Response:** BLM was mandated to identify those areas with wilderness values, and allow Congress to make the final decision as to which areas should be managed in perpetuity as designated wilderness. If Congress intended for BLM to make the final decision as to which lands should be managed forever as wilderness, they would have given that authority to BLM in FLPMA. Congress’ determination to release lands from further consideration as wilderness is equivalent to a determination that the lands are better managed for uses other than wilderness. It is BLM’s responsibility then to determine the best use of those lands, and manage them accordingly.

**CC14 Comment:** Under the “action” alternatives B, C, and D, the 860 acres of... the Tobacco Root Tack-On WSA...would be released from further consideration as wilderness...(DRMP p. 68). This fails to provide a reasonable range of alternatives regarding the Tobacco Root WSA.

**Response:** The No Action alternative considered maintaining the Tobacco Root Tack-on WSA as a WSA. The range of our decision with regard to the disposition of this WSA is to continue to manage it as a WSA, or not. See the response to Comment CC6 for additional discussion on why the BLM proposes to release the Tobacco Root Tack-on WSA.

**CC15 Comment:** Wilderness Study Areas (WSA) are to be managed under the nonimpairment policy of the Interim Management Policy (H-8550-1). This policy states that only activities that do not cause surface disturbance and do not degrade the wilderness values are allowed in WSAs. Off-road vehicle use does cause surface disturbance and does degrade wilderness values even after the activity is terminated. ORV use degrades water quality, fragments wildlife habitat and damages riparian areas as ORVs are driven through streams.

**Response:** Under Wilderness Study Areas, Management Common to All Alternatives, Page 68 of the Draft RMP says the WSAs “...would continue to be managed according to the Interim Management Policy... until such time as Congress either designates them as wilderness or releases them from further consideration as wilderness.” The IMP says with regard to motor vehicle use, “Mechanical transport, including all motorized devices as well as trail and mountain bikes, may only be allowed on existing ways...” (p. 16) It also says, regarding “existing facilities;”

*“Some lands under wilderness review may*



*contain minor facilities that were found in the wilderness inventory process to be substantially unnoticeable. For example, these may include primitive vehicle routes ("ways") and livestock developments. There is nothing in this IMP that requires such facilities to be removed or discontinued. On the contrary, they may be used and maintained as before, as long as this does not cause new impacts that would impair the area's wilderness suitability."* (p. 12)

You are correct that off-road vehicle use causes surface disturbance, and it is already prohibited planning area-wide. Motorized wheeled vehicles are limited to designated routes within the entire planning area. The values you mention that are affected by motor vehicle use were considered in the route designation process.

**CC16 Comment:** Having been into both the East Fork Blacktail and Axolotl Lakes on hunting trips, I fully believe they warrant protection as wilderness and recommend you do so in the final decision.

**Response:** Designation of wilderness is outside the scope of the decisions to be made in this planning process. The East Fork of the Blacktail and the Axolotl Lakes WSAs will continue to be managed as Wilderness Study Areas until designated or released by Congress.

**CC17 Comment:** We support management direction that ensures that aquatic and terrestrial habitat, particularly population strongholds and key refugia for listed or proposed species and narrow endemic populations, are protected and restored. More pristine or less disturbed areas such as wilderness areas and wilderness study areas often provide the key refuge areas and population strongholds for threatened and endangered and sensitive species. It is critical that such areas be protected and maintained, and that wildlife habitat characteristics, including wildlife security, wildlife movement corridors, and wildlife connectivity be protected and enhanced. EPA encourages recommendations for wilderness where such designation would be appropriate to protect unique resource values and provide a higher level of natural resource protection. We also support additional restrictions on snowmobile use in wilderness study areas to protect wildlife and the quality of non-motorized recreational uses in these areas.

**Response:** BLM's recommendations on Wilderness Study Areas (with the exception of the Tobacco Root Tack-ons WSA) were forwarded to the President in 1991 and to Congress later that year. These recommendations cannot be revised once submitted. We have made adjustments in the Proposed RMP/Final EIS to the areas available for

snowmobile use (see the *Travel Management and OHV Use* section).

**CC18 Comment:** The Big Pasture <sic> WSA classification should be extinguished and lands within the old WSA should be leased for oil and gas development with limited surface disturbance stipulations.

**Response:** See the response to CC3 regarding the status of WSAs. If released by Congress, the Hidden Pasture WSA (to which we think the commenter is referring) would be available for oil and gas leasing, subject to stipulations developed by this plan.

**CC19 Comment:** Snowmobile use should be allowed in WSAs. If one wants solitude and quietness go to a designated wilderness area, or better yet, get Congress to act on the proposals that have been in Washington for many years.

**Response:** Snowmobile use is allowed in some WSAs and not in others. WSAs are managed in accordance with the BLM's *Interim Management Policy* discussed elsewhere in these responses.

**CC20 Comment:** Please do more to educate the public and legislative officials as to the value of public wildlands and protect these inventoried wild lands from further degradation. Identify public wild lands as OFF LIMITS to those who would profit by their degradation.

**Response:** See the response to Comment CC3 and CC15 on the management of Wilderness Study Areas. Any commercial uses of Wilderness Study Areas are guided by BLM's *Interim Management Policy for Lands Under Wilderness Review*. The education of public and legislative officials on many public land issues, including those related to the value of public wildlands, is continuous and ongoing.

## DISTRIBUTION OF THE PROPOSED RMP/FINAL EIS

A copy of the Proposed RMP/EIS has been sent to all the entities identified in the lists below. In an effort to reduce printing costs, notices were sent in December 2004 via the *Update* newsletter to all parties who have been involved in the Dillon RMP process, including those whose only involvement was an emailed comment on the Draft RMP/EIS. Individuals responding by regular mail (not email) by January 14, 2005 to request either a CD or hard copy of the Proposed RMP/Final EIS have also been sent the Proposed

RMP/Final EIS. The Proposed RMP/Final EIS is also available on the Dillon RMP website at [www.mt.blm.gov/dfo/rmp](http://www.mt.blm.gov/dfo/rmp), in the BLM Dillon Field Office located in Dillon, Montana at 1005 Selway Drive, at the Beaverhead and Madison County Commissioner offices, and at local libraries and Forest Service offices in the planning area.

### **Federal Government Agencies**

US Army Corp of Engineers—Omaha District  
 US Environmental Protection Agency—Region 8, Montana Office  
 US Environmental Protection Agency—Denver  
 USDA Agricultural Research Service, Sheep Experiment Station, Dubois  
 USDA Farm Service Agency  
 USDA Forest Service—Beaverhead-Deerlodge Supervisor's Office  
 USDA Forest Service—Dillon Ranger District  
 USDA Forest Service—Madison Ranger District  
 USDA Forest Service—Sheridan Work Center  
 USDA Forest Service—Wisdom Ranger District  
 USDA Forest Service—Wise River Ranger District  
 USDA Natural Resources Conservation Service  
 USDA Wildlife Services—Helena  
 USDI Bureau of Reclamation—Dillon  
 USDI Bureau of Reclamation—Billings Area Office  
 USDI Bureau of Reclamation—Regional Office  
 USDI Fish and Wildlife Service, Helena  
 USDI Fish and Wildlife Service, Ennis Fish Hatchery  
 USDI Fish and Wildlife Service, Red Rock Lakes National Wildlife Refuge  
 USDI National Park Service, Big Hole Battlefield  
 USDI National Park Service, Regional Office, Denver  
 USDI Office of Environmental Policy and Compliance  
 USDOT Federal Highway Administration  
 US Federal Energy Regulatory Commission

### **State Government Agencies and Organizations**

Honorable Brian Schwietzer, Governor of Montana  
 Montana Bureau of Mines and Geology  
 Montana Department of Agriculture  
 Montana Department of Environmental Quality  
 Montana Fish, Wildlife & Parks—Bozeman  
 Montana Fish, Wildlife & Parks—Dillon  
 Montana Fish, Wildlife & Parks—Helena  
 Montana Department of Transportation  
 Montana Department of Natural Resources and Conservation  
 Montana Natural Heritage Program  
 Montana State Historic Preservation Office  
 Montana State Library  
 Montana Water Court

### **Local Governments and Boards of Planning**

Beaverhead County Commissioners  
 Beaverhead County Planning Board  
 Beaverhead Conservation District  
 Jefferson County Commissioners  
 Madison County Commissioners  
 Madison County Planning Board  
 Madison Valley Conservation District  
 Ruby Valley Conservation District  
 Town of Lima  
 Virginia City Planning Board  
 Western Montana Resource Advisory Council

### **Tribal Governments and Committees**

Confederated Salish and Kootenai Tribes of the Flathead Reservation  
 Confederated Salish and Kootenai Tribal Historic Preservation Office  
 Shoshone-Bannock Tribes Business Council  
 Shoshone-Bannock Tribes Cultural Resource Program  
 Shoshone-Bannock Tribes Land Use Policy Commission

### **Congressionals**

US Representative Dennis Rehberg  
 US Senator Max Baucus  
 US Senator Conrad Burns

### **State Legislators**

Representative Debbie Barrett, House District #34  
 Representative Diane Rice, House District #33  
 Senator Bill Tash, Senate District #17

### **Nongovernmental Organizations and Businesses**

Alder Gulch Ski Alliance  
 Alliance for the Wild Rockies  
 American Wildlands  
 Ash Grove Cement  
 Bannack Grazing Association  
 Barretts Minerals  
 Basic Biological Services, LLC  
 Bear Creek Ranch  
 Bear Trap Express  
 Beaverhead Outdoor Association  
 Beaverhead Resource Use Plan  
 Beaverhead Sno Riders  
 Bergeson Ranch  
 Big Sheep Creek Ranch  
 Bonneville Sportsman Association  
 Capital Trail Vehicle Association  
 Center for Biological Diversity  
 Chamber of Commerce, Dillon  
 Cimarex Energy

Continental Divide Trail Society  
 Defenders of Wildlife  
 Diamond Hitch Outfitters  
 Dillon Tribune  
 District #3 Snowmobile Clubs  
 Double Eagle Petroleum and Mining Company  
 Dragging Y Cattle Company  
 East Pioneer Stewardship Program  
 Fishing Outfitters Association of Montana  
 Foundation for North American Wild Sheep  
 Friends of the Bitterroot  
 Gainey Foundation  
 Gallatin Bow Hunters Association  
 Gallatin Wildlife Association  
 Greater Yellowstone Coalition  
 Hagenbarth Livestock  
 Hansen Livestock Company  
 Hollowtop Outdoor Primitive School  
 Independent Petroleum Association of Mountain States-Denver  
 Jackpine Savages Snowmobile Club  
 Jefferson River Watershed Council  
 La Cense Montana Ranch  
 Medicine Lake Outfitters  
 Montana 4x4 Association  
 Montana Consensus Council  
 Montana Council of Gem and Mineral Societies  
 Montana Farm Bureau Federation  
 Montana Native Plant Society  
 Montana Public Lands Council  
 Montana River Action  
 Montana Stockgrower's Association  
 Montana Trail Vehicle Riders Association  
 Montana Trapshooters  
 Montana Trout Unlimited  
 Montana Wilderness Association  
 Montana Wildlife Federation  
 Montana Woolgrowers Association  
 Montanans for Quiet Recreation  
 Moose Camp Stock Association  
 National Wildlife Federation  
 Native Forest Network  
 Northwestern Energy  
 Predator Conservation Alliance  
 Public Land Access Association, Inc.  
 Ross Hansen Ranch  
 Sierra Club  
 Sierra Club Grizzly Bear Project  
 Skyline Sportsmen  
 Snowline Grazing Association

Southwestern Montana Stockman's Association  
 The Ecology Center  
 The Lands Council  
 The Madisonian  
 The Montana Coalition for the Appropriate Management of State Lands  
 The Wilderness Society  
 Under Wild Skies Outfitting  
 Vigilante Electric  
 Virginia City Horsewomen's Society  
 Westech Inc.  
 Western Environmental Trade Association  
 Western Watersheds Project, Inc.  
 Wildlife Management Institute  
 Women of the Wild Hiking Club  
 Yellowstone Raft Company

#### **Other Interested/Affected Individuals**

The Draft RMP/EIS was also mailed to individuals and ranch entities requesting either a hard copy or CD version by January 14, 2005.

## **INTERDISCIPLINARY TEAM**

The Dillon RMP EIS was prepared by an interdisciplinary team of specialists from the Dillon Field Office, the Western Montana Zone, and the Montana State Office of the BLM. Beaverhead and Madison County participated in development of the document as formal Cooperating Agencies. Rob Van Deren served on the interdisciplinary team as the counties' representative through July 2004. Economic analysis for the Draft RMP/EIS was provided through an agreement with the University of Montana as a Cooperative Ecosystem Studies Unit, and refined in the Proposed RMP/Final EIS by Montana State Office staff. Technical review and support were provided by both Field Office and State Office staffs. **Table 73** lists the preparers of the document.

Special thanks go to Kathy Ives, Printing Specialist in the Montana State Office for her support in getting the document formatted and printed, and to Lisa Romero, IT Specialist in the Montana State Office, for maintaining the Dillon RMP website.

**Table 73**  
**List of Preparers**

<i><b>Name</b></i>	<i><b>Job Title</b></i>	<i><b>Responsibility</b></i>	<i><b>Education</b></i>
Lynn Anderson	Outdoor Recreation Planner (October 2001-September 2003)	Wild and Scenic Rivers, Visual Resource Management, Recreation	A.A.S. Recreation and Tourism, University of Montana-Western, B.S. Business and Technology, University of Montana-Western 5 years BLM
Steve Armiger	Hydrologist	Water and Air Resources	B.S. Biology, Towson University; M.A. Geography and Environmental Planning, Towson University 4 years BLM
Katie Baltrusch	Planning & Environmental Specialist	Technical Assistance, Editing, Review	B.A. Environmental Studies, MSU-Billings. 3 years BLM
Laurie Blinn	GIS Specialist	GIS Data, Analysis, and Maps	B.S. Biology, Northland College, Ashland, Wisconsin 4 years BLM
Kipper Blotkamp	Fuels Specialist (June 2004-present)	Fire Management	B.S. Forest Resource Management, University of Montana, 3 years BLM
John Bown	Minerals Planner and Environmental Specialist	Leasable Minerals (Oil and Gas, Oil Shale, and Geothermal)	B.S. Geology, Millsaps College; M.S. Geology, University of Missouri-Rolla 25 years BLM
Tim Bozorth	Field Manager	Supervision, RMP Oversight	B.A. University of California at Berkeley 26 years BLM
Joe Casey	Forester	Forest and Woodlands Vegetation, Forest Products, Renewable Energy	B.S. Forest Management, University of Massachusetts-Amherst 25 years BLM
Jeff Daugherty	Realty Specialist	Lands and Realty, Renewable Energy	B.S. Outdoor Recreation/Natural Resources, Colorado State University 14 years BLM
Cinthia Eichhorn	Cartographic Technician (May-August 2003)	GIS Data and Analysis	B. S. Biology, Univ. of Tennessee at Martin; Graduate work at Univ. of Central Arkansas 3 months BLM



Brad Gillespie	Fuels Specialist (June 2002-February 2004)	Fire Ecology and Fire Management	B.S. Forestry Resources, University of Idaho; B.S. Technical Fire Management, Colorado State University 1 year BLM
Mark Goeden	Assistant Field Manager, Renewable Resources	ACEC Assistance, Review	B.S. Biology, North Dakota State University, 1 year Post Graduate Study, Rangeland Ecology, North Dakota State University, 28 years BLM
Bob Gunderson	Geologist	Locatable Minerals, Mineral Materials, Leasable Minerals (Coal and Phosphate)	B.S. Mining Engineer, South Dakota School of Mines and Technology; B.S. Business Management, Univ. of South Dakota, 11 years BLM
Dale Hanson	Paleontologist	Paleontological Overview	B.S. Wildlife Management, New Mexico State University; M.S. Geology (Paleontology), University of Oregon 27 years BLM
Elizabeth Hartsoch	Cartographic Technician (May 2002-January 2004)	GIS Data and Maps	B.S. Biology, Gonzaga University; MA Geography, University of Montana 2 years BLM
Brian Hockett	Rangeland Management Specialist	Special Status Plants	B.S. Range Science, Montana State University 21 years BLM
Paul Hutchinson	Fish Biologist	Fish, Special Status Species—Fish	B.S. Fish & Wildlife Management, Montana State University 2 years BLM
Renee Johnson	Land Use Specialist	Project Manager, Team Leader, Technical Coordinator	B.A. Anthropology/English University of Denver 15 years BLM
Kandace Kulish	Cartographic Technician (April-September 2004)	GIS Data and Maps	B.A. Geography, University of Montana, 6 months BLM
Huey Long	Soil Scientist	Soils	B.S. Agricultural Science, Soils, Montana State University; 9 years BLM

Chris Nemeth	Civil Engineering Technician	Transportation and Facilities	B.S. Forestry, University of Montana, M.S. Range Science, Montana State University 27 years BLM
James Roscoe	Wildlife Biologist	Wildlife, Special Status Species—Animals, Riparian Vegetation	B.S. Wildlife Management, Colorado State University; M.S. Fisheries Biology 26 years BLM
Mark Sant	Archaeologist	Cultural and Historic Resources, Paleontology, Native American Concerns	B.A. Anthropology, Idaho State University M.A. Anthropology, Southern Illinois University (Carbondale) 13 years BLM
John Simons	Rangeland Management Specialist	Rangeland Vegetation, Livestock Grazing	B.S. Rangeland Management, B. S. Soil Science, Washington State University 26 years BLM
Larry Swanson	Associate Director, O'Connor, Center for the Rocky Mountain West, University of Montana, Head, Regional Economy Program	Economics	B.S. Business and Journalism, University of Nebraska M.A. Economics, University of Nebraska Ph.D. Economics, University of Nebraska
John Thompson Montana State Office	Planning and Environmental Specialist	Economics	M.S. Agricultural Economics, Purdue University B.S. Political Science and Economics, South Dakota State University 27 years BLM
Joan Trent Montana State Office	Sociologist	Social Conditions, Environmental Justice	B.A. Psychology, Miami University (Ohio) M.Env. Science, Miami University (Ohio) 26 years BLM
Rob Van Deren	Beaverhead and Madison County representative (November 2001-July 2004)	Special expertise regarding county roads, access issues, weeds, land tenure and social/economic data.	B.S. Business Finance, Montana State University
Rick Waldrup	Outdoor Recreation Planner	Travel Management, Off-Road Vehicles, Recreation, Wilderness and Wilderness Study Areas	B.A. Sociology, Mississippi State University, M. Ed. Outdoor Recreation, Southern Illinois University, 14 years BLM